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December 22, 2016

Jeff S. Jordan
Assistant General Counsel
Federal Election Commission
Office of Complaints Examination and Legal Administration
999 E Street, NW
Washington, DC 20463

Re: MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7177, 7178, 7179, 7182, 7187, and 7188

Dear Mr. Jordan:

In response to the complaints filed by the Foundation for Accountability and Civic Trust ("FACT" or the "Complainant"), we write as counsel to DCCC and Kelly Ward in her official capacity as treasurer in MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7178, 7179, 7182, 7187, and 7188 (collectively, the "Complaints"); Santarsiero for Congress and Lora Haggard, in her official capacity as treasurer, in MUR 7169; Ruben Kihuen for Congress and Jay Petterson, in his official capacity as treasurer, in MUR 7170; Nelson for Wisconsin and Dr. Beth Gillis, in her official capacity as treasurer, in MUR 7171; Colleen Deacon for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7172; Applegate for Congress and Douglas Applegate, in his official capacity as treasurer, in MUR 7173; Mowrer for Iowa and Dennis Skinner, in his official capacity as treasurer, in MUR 7174; Texans for Pete and Wayne Alexander, in his official capacity as treasurer, in MUR 7175; Suzanna Shkreli for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7176; Carroll for Colorado and Mitchell S. Wright, in his official capacity as treasurer, in MUR 7177; Eggman for Congress and Jay Petterson, in his official capacity as treasurer, in MUR 7178; Stephanie Murphy for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7179; Bryan Caforio for Congress and Gonzalo Freixes, in his official capacity as treasurer, in MUR 7182; Friends of Christina M. Hartman and Diane Toapkian, in her official capacity as treasurer, in MUR 7187; and LuAnn Bennett for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7188 (collectively, "Respondents" and individually, each a "Respondent").

INTRODUCTION

These Complaints involve advertisements paid for by the DCCC that supported the election of the named Democratic congressional candidates, and that also opposed the

election, actions, or policies of Donald J. Trump, the Republican candidate for President. The Complaints present three legal issues, none of which is new or complicated: (1) whether the DCCC properly attributed the costs of the advertisements among the multiple candidates appearing in them according to 11 C.F.R. § 106.1(a); (2) whether the DCCC correctly accounted for the portion of the expenses attributed to Donald Trump; and (3) whether the DCCC and the congressional campaigns refrained from coordinating the ads with Hillary for America ("HFA"), so that none of their costs would represent in-kind contributions to HFA.

Because the answer to each of these questions is yes, there is no reason to believe Respondents violated the Federal Election Campaign Act of 1971, as amended (the "Act") or the regulations of the Federal Election Commission (the "FEC" or "Commission"):

First, the DCCC followed the process mandated by Commission regulations and long-standing Commission authority and attributed the cost of the advertisements among the multiple candidates appearing in them on a time-space basis, "according to the benefit reasonably expected to be derived." The Complaints ignore clear Commission authority requiring attribution among multiple candidates in this case of advertisements like these and present no facts to show that any attribution was done incorrectly. Instead, relying solely on one inaccurate news article, they simply assume that the advertisements were misattributed under the concept of "hybrid advertising" based on a generic party reference, which was not the case. These advertisements simply present a text book example of appropriately attributing expenditures under 11 C.F.R. § 106.1(a).

Second, the facts show that the DCCC correctly accounted for and reported the expenses attributable to Donald Trump. Some of the advertisements expressly advocated Trump's defeat, while others did not. The first were reported as independent expenditures, while the second were not, according to the Act and Commission regulations.³

Moreover, as a national party committee, the DCCC had an interest both in urging Donald Trump's defeat and criticizing his policies, above and beyond its central mission of supporting House candidates. Donald Trump was at the top of the ticket and the face of the Republican Party. He advocated policies and took actions strongly opposed by Democratic Party adherents. By expressly advocating Donald Trump's defeat, and by criticizing policy positions he espoused, that were strongly identified with him in the public mind, the DCCC alternatively promoted his defeat and mobilized Democratic opposition to his policies, the latter of which also helped support the ticket as a whole.

Third, none of the advertisements at issue was coordinated with HFA. In fact, the DCCC and campaigns took specific steps to avoid coordination with HFA. The Complaints present no facts to support any claim of coordination, but simply assume that it must have

¹ 11 C.F.R. § 106.1(a)(1).

² See Scott Bland, Dems use loophole to pump millions into fight for the House, Politico, Oct. 18, 2016, http://www.politico.com/story/2016/10/democrats-house-campaign-money-229957.

³ See 11 C.F.R. § 100.16(a) (linking definition of "independent expenditure" to express advocacy).

occurred because a party committee was involved in the advertisements—a presumption that the Supreme Court struck down long ago.⁴

The only factor that makes the resolution of these matters in any way complicated is the Complainant itself. As it has done before, FACT has flooded the Commission with fourteen complaints involving a wide array of respondents, in a clear effort to drain Respondents' resources and burden the Commission, with the ultimate effect of chilling speech and impeding the progress of other, non-frivolous enforcement matters. FACT relied on a single news article to "support" its conclusory allegations and focused the entire Complaints on generic party hybrid advertising that never occurred. The Complaints even carelessly swept up two ads that were attributed entirely to the relevant House campaigns and paid for completely with campaign funds and with coordinated party expenditure authority.

The Respondents complied with longstanding Commission regulations to support and oppose multiple candidates and promote the party as a whole. Because the costs were correctly attributed among multiple candidates, because the ads were correctly reported, and because there was no prohibited coordination with HFA, there is no reason to believe that any violation occurred, and the FEC should immediately dismiss these Complaints.

FACTS

The DCCC is the House campaign committee of the Democratic Party. Its principal mission is to support Democratic congressional candidates and other candidates around the country. In 2016, as before, a key part of the DCCC's activities involved financing television advertisements. Under Commission rules, the legal treatment of these advertisements varies by content—for example, whether they identify clearly identified candidates and, if so, how many; whether they expressly advocate the candidates' election or defeat; and whether they are coordinated with those candidates. The DCCC has had a long history of not simply making coordinated expenditures in support of House campaigns, but using communications to promote the interests of the Democratic Party as a whole.

The presidential candidacy of Donald Trump provided the DCCC with a unique opportunity to promote Democratic House candidates, oppose Trump's election, and mobilize the Democratic Party against Trump's positions for the benefit of the whole ticket. Trump was a major issue in House campaigns, his defeat was a vital concern for Democratic adherents, and fighting back against his policy positions and actions was important to the party as a whole. The DCCC saw the opportunity to pursue all three of these objectives.

⁴ See Colorado Republican Fed. Campaign Comm. v. FEC, 518 U.S. 604, 614-15 (1996) (invalidating prohibition on party independent expenditures); McConnell v. FEC, 540 U.S. 93, 214 (2003), overruled in part on other grounds by Citizens United v. FEC, 558 U.S. 310 (2010) (invalidating requirement that party choose between making independent or coordinated expenditures).

⁵ See FEC MUR 6916, First General Counsel's Report (Oct. 22, 2015).

⁶ See, e.g., 11 C.F.R. § 110.2(c)(2)(ii).

⁷ See, e.g., FEC Advisory Opinion 1985-14 (DCCC).

These Complaints are about advertisements that the DCCC undertook in service of these multiple objectives. Supervised by a senior DCCC employee, DCCC staff worked with House campaigns to develop and produce the advertisements beginning with script development through the advertising buying phase.⁸ Each of the advertisements involved explicit references to clearly identified House candidates and a clearly identified discussion of Donald Trump and were accounted for according to the following model:

- Some of the advertisements expressly advocated the defeat of both the Republican House candidate and Trump. (e.g., "Vote No on [Republican congressional candidate] and Donald Trump"). In these cases, the DCCC paid for and reported the portion of the advertisement attributable to Trump as an independent expenditure opposing him. The remainder was either paid entirely by the Democratic congressional campaign, or split between the campaign and the DCCC, with the DCCC treating its share of the remainder as a coordinated expenditure. Advertisements that included express advocacy against Donald Trump are discussed in MURs 7169, 7170, 7171, 7174, 7176, and 7182.10
- Other ads mentioned both House candidates and Donald Trump, but did not expressly advocate Trump's defeat. Rather, these ads focused on Trump's positions on key issues like national security, immigration, women's health, or gun control and his actions causing unrest and harm to the country. In these cases, the portion of the advertisements that concerned congressional candidates was either paid in whole by the Democratic House campaign, or split between the campaign and the DCCC using funds available under the coordinated party expenditure limits. 11 The remainder was paid for by the DCCC and reported as an operating expense. The ads that did not expressly advocate Trump's defeat are discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188.12

In all of these advertisements, the DCCC attributed the relevant expenses between the referenced candidates—i.e., the House candidate and Donald Trump—on a time/space basis,

⁸ See Exhibit A (affidavit of Michael Ian Russell)..

⁹ See Exhibit B (relevant pages of FEC reports).

¹⁰ The advertisement in MUR 7169 can be found here: https://www.youtubc.com/watch?v=7mb2DsowG00. The advertisement in MUR 7170 can be found here: https://www.youtube.com/watch?v=ulkmwN7ivMU. The advertisement in MUR 7171 can be found here: https://www.youtube.com/watch?v=LS-gU95vm9U. The advertisement in MUR 7174 can be found here: https://www.youtube.com/watch?v=g_4kBjw8r-U. The advertisement in MUR 7176 can be found here: https://www.youtube.com/watch?y=WCx3ObETyrE. The advertisement in MUR 7182 can be found here: https://www.youtube.com/watch?v=i18196BhvWg&feature=youtu.be.

See Exhibit B.

¹² The advertisement in MUR 7172 can be found here: https://www.youtube.com/watch?v=nwdljKSaFdQ. The advertisement in MUR 7175 can be found here: https://www.youtube.com/watch?v=GJCZwJ3tYXw. The advertisement in MUR 7177 can be found here:

https://www.youtube.com/watch?v=7KxcnuejChU&featurc=youtu.be. The advertisement in MUR 7178 can be found here: https://www.youtube.com/watch?v=HixNUxf-t80. The advertisement in MUR 7179 can be found here: https://www.youtube.com/watch?v=OpdllznhrF4. The advertisement in MUR 7188 can be found here: https://www.youtube.com/watch?v=epFwW3WyOWo. For the advertisement in MUR 7177, the Colorado Democratic Party similarly split the costs of the advertisement with Carroll for Colorado on a time/space basis.

determining the portion of each ad that related to each candidate and allocating accordingly. As mentioned above, two of the Complaints involved ads that were paid for entirely with campaign funds, and with DCCC funds used under the coordinated party expenditure limit. 13

All of the advertisements discussed in the Complaints were conceived and executed by the DCCC independently of HFA or its agents. 14 Because the ads would refer to Trump, the staff and campaigns were instructed not to coordinate them with HFA or its agents. 15 The Complaints make no specific allegation of coordination whatsoever, and the declarations accompanying this response demonstrate the absence of any request, suggestion, assent, substantial discussion or material involvement. 16 The declarations demonstrate also that there was no coordination through any common vendor, former employee or independent contractor. 17

LEGAL ANALYSIS

- I. The Costs of the Advertisements Were Properly Attributed Among Multiple Candidates According to the Benefit Reasonably Expected to Be Derived
 - A. Commission rules clearly provide for attribution among multiple candidates.

11 C.F.R. § 106.1(a) provides that "expenditures, including in-kind contributions, independent expenditures, and coordinated expenditures made on behalf of more than one clearly identified Federal candidate shall be attributed to each such candidate according to the benefit reasonably expected to be derived."18 For a television ad, the regulation is explicit about how to make this attribution: it "shall be determined by the proportion of space or time devoted to each candidate as compared to the total space or time devoted to all candidates."19 The Commission has repeatedly and consistently applied this regulation when evaluating communications that refer to multiple candidates.²⁶ For example, when an advertisement identifies candidates in multiple races, the expenditure is attributed based on the time/space dedicated to each race (e.g., the time dedicated to advocating a congressional candidate and her opponent would be attributed separately from the time spent advocating for a presidential candidate).²¹ The portions of the broadcast communication that is dedicated to the legally

16 Id; see also Exhibit C (affidavit of media vendors).

¹³ The advertisement in MUR 7173 can be found here: https://www.youtube.com/watch?v=Rrii1jNAe-I. The advertisement in MUR 7187 can be found here: https://www.youtube.com/watch?v=8DNOEgLEECA. See Exhibit B.

14 See Exhibit A.

¹⁷ The vast majority of vendors working on the ads at issue in these matters did not work for HFA. Two vendors who did work on two different advertisements also did work for HFA but did not use any non-public information about HFA's plans, projects, activities, or needs in working on the advertisement. See Exhibit C. 18 11 C.F.R. § 106.1(a).

¹⁹ Id.

²⁰ See FEC Adv. Op. 2010-10 (NRL PAC); FEC Adv. Op. 2004-37 (Waters) ("attribution shall be determined by the proportion of space devoted to each candidate") (citing 11 C.F.R. § 106.1(a)(1)). ²¹ FEC Adv. Op. 2010-10 (NRL PAC).

required disclaimer and "stand by your ad" messages do not count for either candidate, but rather are split proportionately to the rest of the communication's content.²²

In attributing the cost of a communication among multiple candidates, the Commission does not look to whether or not the segment associated with a particular candidate contains express advocacy. For example, in Advisory Opinion 2004-01, issued to Bush-Cheney '04, Inc. and Alice Forgy Kerr for Congress, the Commission understood that the ad would "not mention or refer to the President's candidacy for re-election [or] expressly advocate the election nor defeat of any presidential candidate." Still, the Commission confirmed that the costs of the communication must be attributed between the two campaigns based on the proportion of space or time devoted to each candidate under 11 C.F.R. § 106.1(a), even though the ad expressly advocated one candidate's election and not the other's. Similarly, in Advisory Opinion 2010-10, the Commission held that when a broadcast communication expressly advocated the election of one candidate, referred to an opposing candidate without expressly advocating defeat, and expressly advocated the election of a third candidate in an altogether different race, the references to the opposing candidate would be attributed to the first candidate under 11 C.F.R. § 106.1(a).

The Commission has applied section 106.1's attribution principles even when only one candidate is referenced but the ad concerned multiple purposes. For example, in Advisory Opinion 2004-29, the Commission allowed Representative Todd Akin to appear in an ad supporting a ballot issue committee, but advised his campaign only to "reimburse the sponsor of the advertisement for the attributable portion of the cost of these coordinated communications," despite the fact that no candidate besides Akin would appear in the ad. And in Advisory Opinion 2006-11, the Commission considered a state party mailing that would expressly advocate for a federal candidate and for other generically referenced candidates of the party committee. The Commission held that, while no less than 50% of the costs could reasonably be attributed to the one identified candidate, "it is appropriate to apply analogous 'space or time' principles set out in 11 C.F.R. 106.1(a)" and that "the benefit reasonably expected to be derived' by the clearly identified candidate should be

²² Specifically, the Commission has advised that the disclaimer component of the communication should be attributed among the candidates or purposes "in the same proportion as the time or space" devoted to each race or purpose. FEC Adv. Op. 2010-10 (NRL PAC) at 6; see also FEC Adv. Op. 2007-09 (Kerry-Edwards) (permitting disclaimer to be attributed among multiple purposes). For instance, in NRL PAC, the FEC stated that, where 16 seconds of a 30-second advertisement are devoted to advocating for a presidential candidate, 8 seconds are devoted to advocating against a Senate candidate, and 6 seconds are devoted to a disclaimer, two-thirds of the expenditure should be reported as having been made in support of the presidential candidate and one-third should be reported as having been made in opposition to the Senate candidate. FEC Adv. Op. 2010-10 at 6 n.7. In Kerry-Edwards, the Commission found that the portion of broadcasting costs incurred by the Kerry-Edwards Campaign in complying with disclaimer requirements were expenses that may be paid for with legal funds. See FEC Adv. Op. 2007-09.

²³ FEC Adv. Op. 2004-01 (Bush/Kerr).

²⁴ Id. at 6. The Commission has since adopted a specific exemption from the coordination rules that vitiates the general attribution rule in the case of certain "endorsement" ads. See 11 C.F.R.§ 109.21(g). However, that exception is not at issue in these matters.

²⁵ FEC Adv. Op. 2010-10 (NRL PAC).

²⁶ FEC Adv. Op. 2004-29 (Akin) at 6.

²⁷ FEC Adv. Op. 2006-11 (Washington Democratic State Central Committee).

measured by determining the amount of space devoted to the clearly identified candidate as compared to the amount of space devoted to the generically referenced party candidates."²⁸

Although the ads aired by Respondents are not so-called "hybrid" ads like those in Advisory Opinion 2006-11, the Commission has nonetheless found that ads that concern candidates, issues, and the party generally are allocated just like ads that concern multiple candidates. The Act "generally permit[s] (and in some cases require[s]) the allocation of expenses attributable to more than one purpose" and "allocation is an appropriate way to fund activities with multiple purposes" as held over and over by the Commission.²⁹ These ads that—in each case—referred to two candidates in two different elections, sometimes expressly advocating Trump's defeat and sometimes opposing his policy positions, were allocated in accordance with these longstanding Commission interpretations.

B. Respondents attributed the advertisements correctly.

The advertisements in MURs 7169, 7170, 7171, 7172, 7174, 7175, 7176, 7177, 7178, 7179, 7182, and 7188 were all correctly attributed among the Democratic House candidates and Donald Trump, just as 11 C.F.R. § 106.1(a) and Commission authority contemplate. The plain language of 11 C.F.R. § 106.1(a) requires that when an expenditure for a broadcast communication clearly identifies more than one Federal candidate, the costs shall be attributed as determined by "the proportion of space or time devoted to each candidate as compared to the total space or time devoted to all candidates." The FEC has additionally confirmed that when an advertisement mentions two opponents running for the same office and a third candidate for a different office, the costs are "allocated among the electoral races, based on a time or space analysis."30 This is how Respondents attributed the costs of these advertisements in this case.

All of the ads at issue referred to clearly identified House candidates and Donald Trump, a clearly identified presidential candidate running. The portions of the ads that were spent discussing the House candidates were attributed to the Democratic House candidate. Conversely, the portions of the ads that were spent discussing Trump were attributed to Trump. If a portion of an ad concerned both the House candidate and Trump, that period of time was attributed between the two races on a reasonable basis. The portion of each ad that was spent displaying the written, visual, and spoken disclaimer as mandated by law was allocated between the two races "in the same proportion as the time or space" devoted to each race in the other portions of the ad, just as the Commission instructed in Advisory Opinion 2010-10.

²⁹ See FEC Adv. Op. 2010-14 (DSCC) (approving allocation of expense between campaign and recount activities); see also FEC Adv. Op. 1988-06 (Gore for President) (holding that "expenditures within the purview of the Act may be made for multiple purposes [and] the Commission believes that expenditures to run an advertisement which includes a fundraising solicitation may be allocated on a 'reasonable basis'"); First General Counsel's Report at 22, FEC Matter Under Review 4131(holding that multi-purpose mailers that include express advocacy of candidates and a solicitation for contributions to a state PAC should be allocated between the mixed purposes). ³⁰ FEC Adv. Op. 2010-10 (NRL PAC).

Take, for example, the advertisement sponsored by the DCCC and Mowrer for Iowa at issue in MUR 7174.³¹ The advertisement contains express advocacy against Representative David Young and Donald Trump. The advertisement criticizes the positions of both Trump and Young and ends by saying, "Vote No on Donald Trump and David Young." The ad starts with approximately 5 seconds concerning Donald Trump and is followed by 4 seconds attributable to the House race, 5 seconds attributable to Trump, 4 seconds attributable to the House race, 3 seconds attributable to Trump, 5 seconds attributable to the House race, and finally 4 seconds containing the legally required disclaimer. The first 26 seconds of the advertisement were equally divided between the congressional race and Donald Trump and the portion of the advertisement spent dedicated to the disclaimer was split on the same proportion. The advertisement was attributed 50% to the Mowrer campaign and 50% to Donald Trump.

Consider also the ad sponsored by the DCCC and Colleen Deacon for Congress at issue in MUR 7172. The ad critiques the positions of both Rep. John Katko and Donald Trump, but does not expressly advocate Trump's defeat. The ad starts with approximately 4 seconds equally attributable to both the House race and Trump and is followed by 2.5 seconds attributable to Trump, 3.5 seconds attributable to the House race, 8 seconds attributable to Trump, 7 seconds attributable to the House race, 3 seconds equally attributable to both the House race and Trump, and ends with 2 seconds dedicated to the disclaimer. The first 28 seconds of the advertisement were equally divided between the House race and Trump, the portion of the advertisement spent dedicated to the disclaimer was split on the same proportion, and so the advertisement was attributed 50% to the Deacon campaign and 50% to Trump. The same methodology was used to attribute the ads generally, and the Complaints provide no basis to question Respondents' attribution.

C. The expenses attributed to the House candidates were correctly reported.

The portion of the ads attributable to the House candidates were paid for and reported as required by the Act and Commission regulations. In almost every case, and as reported to the Commission, the relevant Democratic House campaign directly paid the relevant media vendor for its attributable portion of the costs. In two cases—the ad sponsored by the DCCC and Nelson for Wisconsin in MUR 7171, and the ad sponsored by the DCCC and Shkreli for Congress in MUR 7176—the DCCC paid for some of the portion of the expenses that were attributable to the House campaign as a coordinated expenditure. For the Nelson campaign, the DCCC paid \$33,700 of the costs attributable to the campaign, and for the Shkreli ad, the DCCC paid \$52,960. These payments were well within the DCCC's coordinated party expenditure limits for each race and were reported to the Commission.³³ The Commission has repeatedly held that when a federal campaign pays for the portion of an advertisement

33 See Exhibit B.

³¹ Jim Mowrer, Now We Understand, YouTube (Oct. 19, 2016), https://www.youtube.com/watch?v=g_4kBjw8r-U.

³² Colleen Deacon, *Unsettled*, YouTube (Oct. 8, 2016), https://www.youtube.com/watch?v=Ch4ToJp3Br0.

that is attributable to the relevant candidate under 11 C.F.R. § 106.1(a), no contribution results from the payment of the remaining portion of the expenses for the advertising.³⁴

Contrary to FACT's speculative and unfounded allegations, the DCCC did not make any excessive contributions to any of the House campaigns, because the expenses attributable to those campaigns were either paid for by the campaigns themselves, or by the DCCC under its coordinated expenditure authority.

D. Two of the communications at issue were paid for entirely by the House campaigns and the DCCC as coordinated party expenditures.

For reasons known only to FACT, that organization filed two complaints regarding ads paid for entirely by the relevant Democratic House campaign and under the DCCC's coordinated party expenditure authority. Given the way that they were funded, these expenditures for these ads cannot possibly amount to excessive contributions from the DCCC to the House campaign. MUR 7173 concerns an ad sponsored by the DCCC and Applegate for Congress. The DCCC spent a total of \$91,200 to assist in the airing of this ad and Applegate for Congress paid for all other expenses associated with its creation and airing. The funds spent by the DCCC toward the ad were treated as coordinated party expenditures and reported accordingly.³⁵

Similarly, MUR 7187 concerns an advertisement sponsored by the DCCC and Friends of Christina M. Hartman. The DCCC spent a total of \$96,070 to assist in the airing of this ad and Friends of Christina M. Hartman paid for all other expenses associated with its creation and airing. The funds spent by the DCCC toward this ad were treated as coordinated party expenditures and reported accordingly.³⁶

Thus, in MURs 7173 and 7187, not even the question of attribution was present. At no point was there any basis for FACT to allege any violation of the limits as to the House campaigns.

II. The Portions of the Ads Attributable to Donald Trump Were Correctly Reported

Except in MUR 7177, the portions of the ads referenced by the Complaints and attributable to Donald Trump were paid for by the DCCC. In MUR 7177, the portion of the ad attributable to Trump was paid for by the Colorado Democratic Party. In each case, the party committee either filed the necessary independent expenditure report as to Trump or

³⁴ See FEC Adv. Op. 2004-37 (Waters) at 2 (holing that payment for a "brochure would not constitute support of, or be an in-kind contribution to, the Federal candidates listed in the brochure, provided that the Federal candidates provide reimbursements in the appropriate amount in a timely manner"); FEC Adv. Op. 2004-01 (Bush/Kerr) at 6 (holding that "if the Bush-Cheney Committee reimburses the Kerr Committee for its attributable share of the expenses, there is no contribution"); FEC Adv. Op. 2004-29 (Akin).

³⁵ See Exhibit B.

³⁶ Id.

reported the attributable portion of the ad as operating expenditures, depending on whether the ad contained express advocacy.

To be an independent expenditure, a communication must include "express advocacy" for or against a "clearly identified" candidate.³⁷ However, although all of the relevant ads "clearly identified" Trump under 11 C.F.R. § 100.17, only the ads at issue in MURs 7169, 7170, 7171, 7174, 7176, and 7182 included "express advocacy" against him. 38 In these latter cases, the DCCC reported the portions of the ads attributable to Trump as independent expenditures opposing him.³⁹

The ads in MURs 7172, 7175, 7177, 7178, 7179, and 7188 did not expressly advocate Trump's defeat. Accordingly, the portions of these ads' costs that were attributable to Trump were reported by the party as operating expenditures and not as independent expenditures. The definition of "express advocacy" is clearly set forth in the Commission's regulations, and when a communication does not meet this definition, the Commission has repeatedly held that the communication does not constitute an independent expenditure.⁴⁰

A communication expressly advocates if it: uses phrases such as "vote for the President," "Smith for Congress," or "Bill McKay in '94," or uses campaign slogans or individual words, which in context "can have no other reasonable meaning than to urge the election or defeat of one or more clearly identified candidates," such as a message saying "Nixon's the One," or "Carter '76," or when taken as a whole and with limited reference to external events, "could only be interpreted by a reasonable person as containing advocacy of the election or defeat" of a candidate because the "electoral portion of the communication is unmistakable, unambiguous, and suggestive of only one meaning" such that reasonable minds "could not differ as to whether it encourages actions to elect or defeat" the candidate.41 A message constitutes express advocacy "only if it contains a clear call to a specific electoral

³⁷ 11 C.F.R. § 100.16.

³⁸ Dangerous for PA Women, YouTube (Oct. 20, 2016) at :20 ("Say No To Donald Trump & Brian Fitzpatrick"), https://www.youtube.com/watch?v=7mb2DsowG00; Ruben Kihuen for Congress, Our Values, YouTube (Oct. 18, 2016) at :23 ("Vote NO on Cresent Hardy and Donald Trump"),

https://www.youtube.com/watch?v=ulkmwN7ivMU; Nelson for Wisconsin, No, YouTube (Oct. 10, 2016) at :25 ("Mike Gallagher says we still have to support Donald Trump. No, we don't; we don't have to support Mike Gallagher either"), https://www.youtubc.com/watcli?v=LS-gU95vm9U; Jim Mowrer, Now We Understand, YouTube (Oct. 19, 2016) at :28 ("Vote No on Donald Trump and David Young"),

https://www.youtube.com/watch?v=g_4kBjw8r-U; Suzanna Shkreli for Congress, Brags, YouTube (Oct. 14, 2016) at :22 ("Vote No on Donald Trump and Mike Bishop"), https://www.youtube.com/watch?v=WCx3ObETyrE; Bryan Caforio for Congress, Stand Up, YouTube (Oct. 12, 2016) at :27 ("Vote No on Trump"), https://www.youtube.com/watch?v=i18196BhyWg&feature=youtu.be.

See Exhibit D (excerpts from relevant independent expenditure reports). There would have been no basis to consider the portions of the advertisements attributable to Trump as coordinated communications with the House campaigns. See Coordinated and Independent Expenditures, 68 Fed. Reg. 421, 431 (Jan. 3, 2003) (conduct standard cannot "be satisfied without some link between the request or suggestion and the candidate or political party who is, or that is, clearly identified in the communication"). ⁴⁰ See, e.g., FEC Adv. Op. 1985-14 (DCCC).

^{41 11} C.F.R. § 100.22.

action."⁴² Even according to the Ninth Circuit, which has taken a very expansive approach to defining express advocacy:

Speech cannot be "express advocacy of the election or defeat of a clearly identified candidate" when reasonable minds could differ as to whether it encourages a vote for or against a candidate or encourages the reader to take some other kind of action. We emphasize that if any reasonable alternative reading of speech can be suggested, it cannot be express advocacy subject to the Act's disclosure requirements.⁴³

Even by this broad standard, the advertisements at issue in MURs 7172, 7175, 7177, 7178, 7179, and 7188 did not include any words of express advocacy regarding Trump. In each case, a reasonable alternative reading exists for the communication as it pertains to Trump, insofar as they criticize his policy positions and their negative effects.

Several of the advertisements discuss Republican congressional candidates "support" for Donald Trump's positions. For example, in the advertisement at issue in MUR 7172 the script is as follows:

VOICE OVER: In an unsettled world, John Katko and Donald Trump's approach takes us down a dangerous path. [Showing footage of global unrest].

TRUMP: "I love war in a certain way."

VOICE OVER: But when asked about supporting Trump, Katko said ...

KATKO: "I absolutely will support."

TRUMP: "Tell them to go f--- themselves."

VOICE OVER: When national security leaders condemn Trump's reckless statements on foreign policy...

INTERVIEWER: "People are wondering how those things can happen and you not flat out denounce it?"

KATKO: "I'm more concerned about my race."

VOICE OVER: Not about the safety of our families. Trump and Katko put our national security at risk.

[DISCLAIMER].44

⁴² Statement of Reasons of Vice Chairman Petersen and Commissioners Hunter and McGahn at 4, Matter Under Review 6113 (Dec. 18, 2009).

⁴³ FEC v. Furgatch, 807 F.2d 857, 864 (9th Cir. 1987).

⁴⁴ Colleen Deacon, *Unsettled*, YouTube (Oct. 8, 2016), https://www.youtube.com/watch?v=Ch4ToJp3Br0.

However, the word "support" in this context cannot only be interpreted as a call to vote against Donald Trump. Rather, it is intended to critique Donald Trump's desire for war, dangerous foreign policy "approach," and other previous actions and policy positions and Representative Katko's support of Trump despite these positions. This advertisement concludes with the statement that "Trump and Katko put our national security at risk." The advertisement does not say that viewers should vote against Donald Trump for President but refers to the contemporaneous actions of both Representative Katko and Donald Trump that are adverse to the United States' national security interests.

Similarly, consider the advertisement at issue in MUR 7175. The script of advertisement is as follows:

TRUMP: We're going to build a wall.

VOICE OVER: Donald Trump is tearing us apart. [SHOWING CURRENT NATIONAL UNREST]. Trump called a judge unqualified because of his Mexican heritage.

TRUMP: He's a Mexican. We're building a wall between here and Mexico.

VOICE OVER: And called Mexicans rapists and murderers. Donald Trump. Too dangerous for us. But Will Hurd says he could still support Donald Trump. And Will Hurd shares the same bad ideas.

WILL HURD: A wall absolutely makes sense.

VOICE OVER: Will Hurd. He's the wrong choice for Texas families.

[DISCLAIMER].45

This advertisement refers to several statements and policy positions of Donald Trump and observes the contemporaneous effects: his positions and actions are "tearing us apart" at this time. The advertisement does not include a call to defeat Donald Trump in the presidential election, but it does include a call to defeat Representative Hurd: it says that he is the "wrong choice for Texas families" because of his support of Donald Trump's positions. Citing Representative Hurd's support for Donald Trump as a reason to defeat Representative Hurd is not express advocacy with regard to Donald Trump. There is no portion of the advertisement that could only be interpreted as a call to vote against Donald Trump and thus the advertisement does not contain express advocacy against Donald Trump as defined at 11 C.F.R. § 100.22. As there is no "express advocacy" or "clear call to a specific electoral action" with regard to Donald Trump in any of the advertisements discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188, no portion of any of these advertisements should have been reported as independent expenditures opposing Donald Trump.

⁴⁵ Wrong Choice for TX Families, YouTube (Oct. 4, 2015), https://www.youtube.com/watch?v=GJCZwJ3tYXw.

Because the portion of the advertisements discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188 attributable to Donald Trump did not contain express advocacy opposing Trump, they were properly reported by the DCCC and Colorado Democratic Party as operating expenditures. The Commission's regulations and previous decisions are clear: if a party committee airs a communication that does not constitute an independent expenditure or party coordinated communication, the expenses associated with the advertisements, or relevant portions thereof are operating expenditures.⁴⁶

III. The Complaint Presents No Genuine Allegation of Coordination with HFA, and The Facts Demonstrate That None Occurred

None of the relevant advertisements was coordinated with HFA. There was no coordination between the Respondents on the one hand, and HFA on the other, regarding any of the advertisements cited by the Complaints. None of the Complaints alleges any specific facts that could even be taken to suggest coordination.⁴⁷

Instead, the Complaints make the conclusory allegation that the advertisements were coordinated with HFA. However, such pure speculation cannot support a finding of a reason to believe. The Commission may find "reason to believe" only if a Complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the Act. For claims of coordination, the Commission requires an even stronger showing: that Complainant provide "probative information of coordination." The Commission has also made clear that "unwarranted legal conclusions [drawn] from asserted facts" or "mere speculation" are not sufficient to find reason to believe that Respondents violated the Act through impermissible coordination. Because the Complaints rely exclusively on pure speculation and unwarranted legal conclusions for their coordination claims, there is no reason to believe any coordination occurred.

The Commission also must consider whether Respondents have provided "sufficiently compelling evidence" to refute the Complaints' claims. In this case, the declarations accompanying this response provide strong, probative evidence of the absence of coordination between Respondents and HFA on these ads. ⁵¹ The declaration of Michael Ian Russell, the DCCC's Deputy Executive Director and Political Director, is especially important. ⁵² Mr. Russell makes clear that he supervised the communications campaign at issue in these Complaints; that it did not involve any request, suggestion or assent from HFA; that he instructed those participating in the program to refrain from any

⁴⁸ Statement of Reasons, Commissioners Mason, Sandstrom, Smith, and Thomas, MUR 4960 (Dec. 21, 2001).

⁴⁶ FEC Adv. Op. 1985-14 (DCCC) ("DCCC may report these expenditures as operating expenditures.").

⁴⁷ See Exhibit A.

⁴⁹ FEC Matter Under Review 5999, Factual and Legal Analysis (Dec. 15, 2008); see also FEC Matter Under Review 6059, Factual and Legal Analysis, at 6 (Feb. 3, 2009).

⁵⁰ FEC Matter Under Review 4960 (Clinton for U.S. Exploratory Committee), Statement of Reasons of Commissioners David M. Mason, Karl J. Sandstrom, Bradley A. Smith, and Scott E. Thomas at 1 (Dec. 21, 2000). ⁵¹ See Exhibits A and C.

⁵² See Exhibit A.

communications with HFA regarding the ads; and that he knows of no deviation from these instructions.⁵³

Because the Complaints rely entirely on speculation to mount the claim of coordination, and because Respondents have provided compelling evidence to refute this speculation even when not required to do so, the Commission should dismiss these baseless claims.

CONCLUSION

The FACT complaints are based completely on an incorrect factual assumption and a blatant misunderstanding of the law. FACT assumed that the Respondents were allocating the advertisements at issue according to the Commission's guidance on generic party hybrid advertising and apparently believe that such hybrid advertising is the only case in which a committee should allocate an advertisement between multiple federal candidates or purposes. In reality, the Commission's regulations provide for the attribution of any communication that concerns multiple Federal candidates. The Respondents followed the Commission's attribution regulations here, and paid for and reported each portion of the advertisements according to the requirements of the Act.

There is absolutely no merit to the allegations in any of the complaints in MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7177, 7178, 7179, 7182, 7187, and 7188 and the Commission should dismiss all of these complaints against all of the Respondents immediately.

Very truly yours,

= M. /2_

Marc E. Elias

Brian G. Svoboda

Graham M. Wilson

Rachel L. Jacobs

Enclosure

Counsel to:

DCCC

Santarsiero for Congress and Lora Haggard, in her official capacity as treasurer Ruben Kihuen for Congress and Jay Petterson, in his official capacity as treasurer Nelson for Wisconsin and Dr. Beth Gillis, in her official capacity, as treasurer Colleen Deacon for Congress and Jennifer May, in her official capacity as treasurer Applegate for Congress and Douglas Applegate, in his official capacity as treasurer

⁵³ *Id*.

Mowrer for Iowa and Dennis Skinner, in his official capacity as treasurer Texans for Pete and Wayne Alexander, in his official capacity as treasurer Suzanna Shkreli for Congress and Jennifer May, in her official capacity as treasurer Carroll for Colorado and Mitchell S. Wright, in his official capacity as treasurer Eggman for Congress and Jay Petterson, in his official capacity as treasurer Stephanie Murphy for Congress and Jennifer May, in her official capacity as treasurer Bryan Caforio for Congress and Gonzalo Freixes, in his official capacity as treasurer Friends of Christina M. Hartman and Diane Toapkian, in her official capacity as treasurer

LuAnn Bennett for Congress and Jennifer May, in her official capacity as treasurer

Exhibit A

BEFORE THE

FEDERAL ELECTION COMMISSION

DECLARATION OF MICHAEL IAN RUSSELL

- I, Michael Ian Russell, do declare and state as follows:
 - 1. During the 2016 election, I worked for DCCC as Deputy Executive Director and Political Director. Through that position, I am familiar with the matters discussed herein. At no point during the 2016 election cycle did I serve as an employee, independent contractor, vendor, or agent of Hillary for America ("HFA").
 - 2. As the Deputy Executive Director and Political Director of DCCC, I worked with, and supervised other DCCC employees who worked with, numerous House campaigns on television advertisements that mentioned Donald Trump. Specifically, I worked with (a) Santarsiero for Congress on the advertisement discussed in the complaint in MUR 7169; (b) Ruben Kiluen for Congress on the advertisement discussed in the complaint in MUR. 7170 (c) Nelson for Wisconsin on the advertisement discussed in the complaint in MUR. 7171 (d) Colleen Deacon for Congress on the advertisement discussed in the complaint in MUR 7172 (e) Applegate for Congress on the advertisement discussed in the complaint in MUR 7173 (f) Mowrer for lows on the advertisement discussed in the complaint in MUR 7174 (g) Texans for Pete on the advertisement discussed in the complaint in MUR 7175 (i) Shkreli for Congress on the advertisement discussed in the complaint in MUR 7176 (i) Carroll for Colorado on the advertisement discussed in the complaint in MUR 7177 (k) Egeman for Congress on the advertisement discussed in the complaint in MUR 7178 (1) Murphy for Congress on the advertisement discussed in the complaint in MUR 7179 (m) Bryan Caforio for Congress on the advertisement discussed in the complaint in MUR 7182 (n) Friends of Christina M. Hartman on the advertisement discussed in the complaint in MUR 7187 and (o) LuApa Bennett for Congress on the advertisement discussed in the complaint in MUR 7188 (each a "Campaign" or "Advertisement" or collectively the "Campaigns" and "Advertisements," respectively). I took the lead at DCCC for managing this advertising program. I supervised this program and all DCCC staff working on these Advertisements. I was also in contact, directly or indirectly through my staff, with each of the Campaigns involved in these Advertisements.
 - 3. This program was conceived by DCCC without any request, suggestion, or assent by HFA or its agents. DCCC believed that the advertising program would be an effective way to promote our Democratic House candidates and the Democratic Party, given the intense opposition among Democratic voters to Donald Trump and the policies and positions he espoused.
 - 4. I managed every aspect of the creation, production, and dissemination process for each of these Advertisements, starting with script development through the advertising buying phase of each Advertisement. To that end, with a core group of DCCC staff, I worked directly with each Campaign and advertising vendor to draft each script and produce and edit each Advertisement.

PAGE 62/83

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- 5. I instructed my staff working on the Advertisements and the staff of Campaigns involved with the Advertisements not to discuss any aspect of these Advertisements with HFA or its agents. Likewise, my staff and the Campaigns were instructed not to have any involvement with HFA or its agents with regard to these Advertisements. I am not aware of any breach of or deviation from this protocol.
- 6. To the best of my knowledge, and consistent with the instructions I gave, these Advertisements were developed internally at DCCC in coordination with each Campaign without any communication with or from Hillary for America or its agents. Likewise, to the best of my knowledge, none of the Advertisements were created, produced, or distributed at the suggestion or request of HFA or its agents nor did they assent to the creation, production, or distribution of any of the Advertisements.
- 7. In my work for DCCC on the Advertisements, to the best of my knowledge, neither I nor any DCCC employee or Campaign staff working on these Advertisements had any involvement with HFA or its agents regarding any Advertisement in any way, including, but not limited to:
 - i. the content of any Advertisement;
 - ii. the intended audience for any Advertisement;
 - iii. the means or mode of any Advertisement;
 - iv. the specific media outlet used for any Advertisement;
 - v. the timing or frequency of any Advertisement; or
 - vi. the duration of any Advertisements.
 - 8. In my work for DCCC on the Advertisements, to the best of my knowledge, neither I nor any DCCC employee or Campaign staff working on these Advertisements had discussions about with HFA or its agents about any Advertisement or HFA's plans, projects, activities, or needs with regard to any Advertisement. Neither HFA nor its agents conveyed to me, and to the best of my knowledge to any DCCC employee or Campaign staff working on these Advertisements, any relevant information about HFA's plans, projects, activities, or needs concerning any Advertisement.
 - 9. To the best of my knowledge, no DCCC employee or Campaign staff working on these Advertisements was employed by HFA at any time during the 120 days prior to the date that each Advertisement was aired.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 2/4+ day of December, 2016.

Exhibit B

Image# 201612089039916605

SCHEDULE F . (FEC Form 3X) ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

PAGE	10910)5 OF	109107	

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SCHEDULE F (FEC Form 3X)

ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

FOR LINE 25 OF FORM 3X (To be used only by Political Committees in the General Election) NAME OF COMMITTEE (In Full) DCCC Has your committee been designated to make Full Name of Subordinate Committee coordinated expenditures by a political party committee? DCCC YES NO If YES, name the designating committee: Mailing Address 430 South Capitol Street, SE 2nd Floor **Democratic National Committee &** ZIP Code Michigan Democratic Party Washington 20003-4024 DC Full Name (Last, First, Middle Initial) of Each Payee : ! Memo item Purpose of Expanditure Media Services Three Point Media, LLC Category/ Type Mailing Address 1000 Potomac Street, NW Date . Suite 500 City State Zip Code ັ 10 2018 DC 20007 Name of Federal Candidate Supported Office Sought: |x State: ΜÌ Amount Driskell, Gretchen, , , District: 07 Presidential 1000.00 Aggregate General Election 96200.00 Expenditure for this Candidate Transaction ID : SF-951470 Full Name (Last, First, Middle Initial) of Each Payee Purpose of Expenditure ! _; Memo Item Media Services Mundy Katowitz Media, Inc. Category/ Mailing Address 1322 G Street, SE Туро Date Zip Code City State Washington 10 13 2016 DC 20003 Name of Federal Cantidate Supported Office Sought: X | House State: MI Amount Driskell, Gretchen, . . Senate District: 07 Presidential 95200.00 Aggregate General Election 96200.00 Expenditure for this Candidate Transaction ID: SF-951459 Full Name (Last, First, Middle Initial) of Each Payee Purpose of Expenditure I Memo Item Media Services **Buying Time, LLC** Category! Mailing Address 650 Massachusetts Avenue, NW Турв Suite 210 Date City State Zip Code 10 2016 Washington DC 20001 Name of Federal Candidate-Supported Office Sought: | x | House State: Amount District: Shkreli, Suzanna, . . 08 Presidential 52960.00 Aggregate General Election 52960.00 Expenditure for this Candidate Transaction ID: SF-952064 149160.00 SUBTOTAL of Expenditures This Page (optional)..... TOTAL This Period (last page this line number only).....

PAGE 47529 OF 47535

SCHEDULE F (FEC Form 3X)

ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

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SCHEDULE F (FEC Form 3X)

ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

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SCHEDULE F (FEC Form 3X) ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)

TOTAL This Period (last page this line number only)......

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE PAGE 83515 OF 63518 FOR LINE 25 OF FORM 3X (To be used only by Political Committees in the General Election) NAME OF COMMITTEE (In Full) DCCC Has your committee been designated to make Full Name of Subordinate Committee coordinated expenditures by a political party committee? DCCC x YES NO If YES, name the designating committee: Mailing Address 430 South Capitol Street, SE **Democratic National Committee &** 2nd Floor ZIP Code California Democratic Party Washington 20003-4024 DC Full Name (Last, First, Middle Initial) of Each Payee Memo Item Purpose of Expenditure Media Services The New Media Firm, Inc. Category/ Mailing Address 1730 Rhode Island Ave., NW Type Date Suite 213 City State Zip Code 09 20 2016 Washington DÇ 20036 Name of Federal Candidate Supported Office Sought: x House State: CA Amount Applegate, Doug, Loren, . Senate District: 49 Presidential 91200.00 Aggregate General Election 91200.00 Expenditure for this Candidate Transaction ID : SF-949904 Full Name (Last, First, Middle Initial) of Each Payee Purpose of Expenditure Memo Item Media Services Screen Strategies Media, LLC Category/ Mailing Address 11150 Fairfax Blvd Type Suite 505 Date City State Zip Code 09 23 2016 VA Fairfax 22030 Name of Federal Candidate Supported Office Sought: ".X-House State: CA Amount Senate District: 25 Caforio, Bryan, . . Presidential 46490.00 Aggregate General Election 96200.00 Expenditure for this Candidate Transaction ID: SF-950014 Full Name (Last, First, Middle Initial) of Each Payee . Memo item Purpose of Expenditure Media Services Screen Strategies Media, LLC Category/ Type Mailing Address 11150 Fairfax Blvd Suite 505 Date State Zip Code 2016 28 09 Fairfax VA .22030 Name of Federal Candidate Supported Office Sought: * House State: CA Amount 25 Catorio, Bryan, . . Senate District: Presidential 13431.04 Aggregate General Election 96200.00 Expenditure for this Candidate Transaction ID : SF-950737 151121.04 SUBTOTAL of Expenditures This Page (optional)......

Exhibit C

BEFORE THE

FEDERAL ELECTION COMMISSION

DECLARATION OF MAURA JOHNSON - MUR 7179

- 1, Maura Johnson, do declare and state as follows:
 - During the 2016 election, as a Mcdia Supervisor at GMMB, Inc. ("GMMB"), I provided
 media buying services for Ralston Lapp Media, the consultant working with Stephanie
 Murphy for Congress. Through that position, I am familiar with the matters discussed
 herein.
 - 2. During that time, I worked with DCCC and Stephanie Murphy for Congress to distribute an advertisement discussed in the complaint in FEC Matter Under Review 7179 (the "Advertisement"). To the best of my knowledge and belief, I was the only employee of GMMB that worked on the Advertisement.
 - 3. GMMB worked for Hillary for America ("HFA") during the 2016 election cycle.
 - 4. To the best of my knowledge, the Advertisement was not created, produced, or distributed at the suggestion or request of HFA or its agents and HFA or its agents did not assent to the creation, production, or distribution of the Advertisement.
 - 5. To the best of my knowledge, neither I, nor any employee or agent of GMMB working on the Advertisement, had any involvement with HFA or its agents regarding the Advertisement in any way, including, but not limited to:

MJ 12/21/16

- i. the content of the Advertisement;
- ii. the intended audience for the Advertisement:
- iii. the means or mode of the Advertisement;
- iv. the specific media outlet used for the Advertisement;
- v. the timing or frequency of the Advertisement; or
- vi. the duration of the Advertisement.
- 6. To the best of my knowledge, neither I, nor any employee or agent of GMMB working on the Advertisement, had discussions with HFA or its agents about the Advertisement.
- 7. To the best of my knowledge, neither I, nor any employee or agent of GMMB in working on the Advertisement, used or conveyed information about HFA's campaign plans, projects, activities, or needs to create, produce, or distribute the Advertisement.
- 8. To the best of my knowledge, neither I, nor any employee or agent of GMMB in working on the Advertisement, used information previously used by GMMB in providing services to HFA in relation to the distribution of the Advertisement.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this <u>31</u> day of December, 2016.

Maura Johnson

BEFORE THE

FEDERAL ELECTION COMMISSION

DECLARATION OF DAVID DIXON AND RICHARD DAVIS, DIXON/DAVIS MEDIA GROUP LLC - MUR 7188

David Dixon and Richard Davis do declare and state as follows:

- During the 2016 election, we were partners at the Dixon/Davis Media Group LLC
 ("Dixon/Davis"). Through that position, we are familiar with the matters discussed
 herein.
- At the request of DCCC, and with the guidance of DCCC and their legal counsel,
 Dixon/Davis worked with DCCC and LuAnn Bennett for Congress to create, produce,
 and distribute an advertisement discussed in the complaint in FEC Matter Under Review
 7188 (the "Advertisement").
- 3. Dixon/Davis worked for Hillary for America ("HFA") during the 2016 election cycle.
- 4. To the best of our knowledge, the Advertisement was not created, produced, or distributed at the suggestion or request of HFA or its agents and HFA or its agents did not assent to the creation, production, or distribution of the Advertisement.
- 5. To the best of our knowledge, no employee or agent of Dixon/Davis working on the

 Advertisement had any involvement with HFA or its agents regarding the Advertisement
 in any way, including, but not limited to:
 - i. the content of the Advertisement;

- ii. the intended audience for the Advertisement;
- iii. the means or mode of the Advertisement;
- iv. the specific media outlet used for the Advertisement;
- v. the timing or frequency of the Advertisement; or
- vi. the duration of the Advertisement.
- 6. To the best of our knowledge, no employee or agent of Dixon/Davis working on the Advertisement had discussions with HFA or its agents about the Advertisement.
- 7. To the best of our knowledge, no employee or agent of Dixon/Davis in working on the Advertisement used or conveyed information about HFA's campaign plans, projects, activities, or needs to create, produce, or distribute the Advertisement.
- 8. To the best of our knowledge, no employee or agent of Dixon/Davis in working on the Advertisement used information previously used by Dixon/Davis in providing services to HFA in relation to the creation, production, or distribution of the Advertisement.

We declare under penalty of perjury that the foregoing is true and correct. Executed on this **22** day of December, 2016.

David Dixon

Richard

Exhibit D

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 9 OF 9
(Schedule E)	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER V
	C1 c00000935
Check if 24-hour report Amends report New report Amends report file	d on
Full Name of Payee	Date of Public Distribution/Dissemination
Old Towne Media Date of Dissemination: 10/19/16	10 19 2016
Malling Address 4507 Penwood Dr	Amount
	" - security and and investigation is replaced and in the
City State Zip Code	48000.00
Alexandria • VA 22310	Transaction ID: SE-952363 Date of Disbursement or Obligation
Purpose of Expandituro Media Buy Category/ Type O04	10 18 2016
Nume of Federal Candidate Support Office	ce Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought 2742321.20 Dist	oursement For: Primary Gonoral Other (specify) ▶
Full Name of Payee	Date of Public Distribution/Dissemination
AL Media, LLC Date of Dissemination: 10/19/16	المحضد الماء العلاما المدما
Malling Address 222 West Ontario West	10 19 2010
Suite 600	Amount
City State Zip Code	81321.00
Chicago IL 60654	Transaction ID : SE-952867 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type 004	10 14 2016
Name of Federal Candidate Support Office	ce Sought: House District: 00
Oppose Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought 2742321.20 2010	ourscment For: Primary General 6 Other (specify) ▶
	punk anti-ati-a
(a) SUBTOTAL of Itemized Independent Expenditures	129321.00
(b) SUBTOTAL of Uniterrized Independent Expenditures	
(c) TOTAL Independent Expenditures	273146.39
Under penalty of perjury I certify that the independent expenditures reported horein were not me with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	
Kelly C. Ward Signaturo Date	10 21 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDI	TURES	PAGE 48 OF 60
(Schedule E)		FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)		FEC IDENTIFICATION NUMBER ▼
DCCC		C, c00000935
Check if 24-hour report 3 48-hour report 3 New report	ort [] Amends repo	ort filed on the state of the s
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/24/16		Date of Public Distribution/Dissemination
Mailing Addless 11150 Fairfax Blvd	10 1 24 1 2016	
Suite 505		Amount
City State	Zip Code	45000.00
Fairlax VA	22030	Transaction ID : SE-952072 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy	Category/ Type 004	10 17 2016
Name of Federal Candidate	Support	Office Sought: House District: 00
Donald J. Trump	Oppose	President Senate State:
	53174.61	Disbursement For: Primary General 2016 Other (specify)
Full Name of Payee		Date of Public Distribution/Dissemination
AL Media LLC		Date of Public Distribution of the Public of Public Distribution of the Pub
Date of Dissemination: 10/24/16		10 24 2016
Mailing Address 222 W Ontario St		Amount
Suite 600	7.0.1	
City State Chicago IL	Zip Code 60654	Transaction ID : SE-953187 Date of Disbursoment or Obligation
Purpose of Expenditure Media Buy	Category/ I 004 Type 004	10 21 2016
Name of Federal Candidate	Support	Office Sought: House District: 00
Donald J. Trump	Oppose	President Sonate State:
Calendar Year-To-Date Per Election for Office Sought	3653174.61	Disbursement For: Primary General 2016 Other (specify) >
(a) SUBTOTAL of Itemized Independent Expenditures		176250.00
(b) SUBTOTAL of Unitemized Independent Expenditures	***************************************	
(c) TOTAL Independent Expenditures		
Under penalty of porjury I certify that the independent expenditures with, or at the request or suggestion of, any candidate or authorized party committee) any political party committee or its agent.	•	·
Kelly C. Wend	Date	10 25 2016
Signature		-

24/48 HOUR REPORT OF INDEPENDENT EXPENDITUR	RES PAGE 51 OF 60
(Schedule E)	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER Y
1	C c00000935
Check If 24-hour report 48-hour report New report	Amendo report filed on [M*-,4] / [04-6] / [474747474]
Full Name of Payee AL Media LLC Date of Dissemination: 10/25/16	Date of Public Distribution/Dissemination
Mailing Address 222 W Ontario St	10 25 2016
Suite 600	Amount
City State Zip Co	
Chicago IL 60654	Transaction ID : SE-953228 Date of Disbursement or Obligation
	rype 004 10 24 2016
Name of Federal Candidate	Support Office Sought: House District: 00
Doneld J. Trump	Oppose President Senate State:
Calendar Year-To-Date Per Election for Office Sought 4369947.	
Full Name of Payee	Date of Public Distribution/Dissemination
Canal Partners Media, LLC Date of Dissemination: 10/25/16	10 25 2016
Mailing Address 25 Whitlock Place	Amount
Suite 200	1
City State Zip Co	السيفيسية والمجالية المالية ال
Marietto GA 3006/	64 Transaction ID : SE-952497 Date of Disbursement or Obligation
	egory/ 004 10 19 2016
Name of Federal Candidate	Support Office Sought: House District: 00
Donald J. Trump	Oppose President Senato State:
Calendar Year-To-Date Per Election for Office Sought 43699	Disbursement For: Primary General 2016 Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	193082.00
(b) SUBTOTAL of Uniternized Independent Expenditures	
(c) TOTAL Independent Expenditures	A Land Company Company
Under penalty of perjury I certify that the independent expenditures reports with, or at the request or suggestion of, any candidate or authorized commit party committee) any political party committee or its agent.	ted herein were not made in cooperation, consultation, or concert mittee or agent of either, or (if the reporting entity is not a political
Kelly C. Word	90 th 6 1 7 2006
Signature	Date 10 (25 , 2016)

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE DO DE TO
(Schedule E)	PAGE 23 OF 23 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
DCCC	C C00000935
	C C00000535
Check if 24-hour report 48-hour report New report Amends report file	d ou [11, 10, 10] , [1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1,
Full Name of Payee	Date of Public Distribution/Dissemination
Moore Campaigns, LLC	10 28 2016
Mailing Address 447 Irving St, NW	1 1 1 1 2010
	Amount
City State Zip Code	4472.36
Washington DC 20010	Transaction ID : SE-954234 Date of Olsbursement or Obligation
Purpose of Expenditure Mail Services Category/ Type O08	10 27 2016
Name of Federal Candidate Support Office	e Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
	ursement For: Primary General
Per Election for Office Sought 4593686.81 2016	Other (specify) >
Full Namo of Payee	Date of Public Distribution/Dissemination
AL Media LLC	AUGUST FOR THE AUGUST
Maillan Address	10 28 2016
Mailing Address 222 W Ontario St	Amount
Suite 600 City State Zip Code	Annah
City State Zip Code Chicogo IL 60654	30525.00 ; Transaction ID : SE-953928
Purpose of Expenditure	Date of Disbursoment or Obligation
Modia Buy Calegory 004	10 26 2016
Name of Federal Candidate . Support Office	e Sought: House District: 00
Denald J. Trump Oppose	President Senate State:
	ursement For: Primary X General
Per Election for Office Sought 4593586.81 2010	Other (spediy)
(a) SUBTOTAL of Itemized Independent Expenditures	34997.36
•	American Carlos Con Service Service and produced and desired
(b) SUBTOTAL of Unitemized Independent Expenditures	!- !
At Man to december 5 comments and	
(c) TOTAL Independent Expenditures	1588663,18
Under penalty of perjury I certify that the independent expenditures reported herein were not m with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	ade in cooperation, consultation, or concert if, or (if the reporting entity is not a political
Kelly C. IYard Fu	0 29 2016
Signature	. I the transfer i

Image# 201610319037014651

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 7 OF 8
(Schedule E)	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
DCCC	C c00000935
	0 00000000
Check if X 24-hour report 48-hour report New report Amends report	filed on the state of the state
Full Name of Payee Adelstein & Associates LLC	Date of Public Distribution/Dissemination
Date of Dissernination: 10/31/16	10 31 2016
Mailing Address 222 West Ontario Street, Suite 600	Amount
City State Zip Code	80000.00
Chicago IL 60654	Transaction ID: SE-954371 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type O04	10 / D 20 / Y 2 Y 2 Y 2 Y 2 Y 2 Y 2 Y 2 Y 2 Y 2 Y
Name of Federal Candidate Support	Office Sought: House District: 00
Trump, Donald, J., , Oppose	President Senate State:
Calendar Year-To-Date	Disbursement For: Primary Seneral
	2016 Other (specify) ▶
Full Name of Payee Adelstein & Associates LLC Date of Dissemination: 10/31/16	Date of Public Distribution/Dissemination
Mailing Address 222 West Ontario Street, Suite 600	Amount
City State Zip Code	67387.50
Chicago IL 60654	Transaction ID : SE-954372 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Typo O04	10 28 2016
Name of Federal Candidate Support	Office Sought: House District: 00
Trump, Donáld, J., ,	President Senate State:
	Disbursement For: Primary General Other (specify)
(a) SUBTOTAL of Itemized Independent Expenditures	147387.50
the CHRYSTAL of Habening Independent Funerality	
(b) SUBTOTAL of Uniternized Independent Expenditures	
(c) TOTAL Independent Expenditures	
(c) TOTAL Maganaga Experiations	
Under penalty of perjury I certify that the independent expenditures reported herein were newith, or at the request or suggestion of, any candidate or authorized committee or agent of party committee) any political party committee or its agent.	
Ward, Kelly, C.,	THE PERSON IN THE PROPERTY OF
[Electronically Filed] Date	10 31 2016

24/48 HOUR REPORT OF INDEPENDER (Schedule E)	NT EXPE	NDITURES.		PAGE	51 OF 52 SE OF FORM 24/48
NAME OF COMMITTEE (In Full)			· · · · · · · · · · · · · · · · · · ·		CATION NUMBER ▼
DCCC .				_	
				C c00000	935
Check if 24-hour report 24-hour report	New	report. Amends rep	ort filed on	. a . e	. + Y Y
Full Name of Payee			Date	of Public Distrib	ution/Dissemination
Screen Strategies Media, LLC Date of Dissemination:	10/13/16	·		10 18	2016
Malling Address 11150 Fairfax Blvd		-		-1	
Suite 505		•	Arnou	nı	
City	State	Zip Code			134898.50
Fairfax	VA	22030		action ID : SE-	
Purpose of Expenditure Mødia Buy		Category/ Type 004		10 11	
Name of Federal Candidate		Support	Office Sough	t; Hous	e District; 00
Donald J. Trump		X Oppose	X Preside	-	
Calendar Year-To-Date	·		Disbursemen	i For: Pri	mary X General
Per Election for Office Sought	,	2613000.20	2016	ther (spacify) 🕨	
Full Name of Payee					ution/Dissemination
Kully Hall, LLC					
Date of Dissemination:	10/18/16			10" 18	2016
Mailing Address 1932 1st Ave, Suite 203			Amou	nt	
City	Stato	Zip Code			6225.00
Scattle	WA	98101	Transa Dale (iction (D : SE-9) of Disbursement	52379 Lor Obligation
Purpose of Expenditure Media Buy Media Production ,		Category/ Type		10 18	
Name of Federal Candidate		Support	Office Sough	it: Thous	e District: 00 ··
Donald J. Trump		X. Oppose	X Preside	ani j Sena	te State:
Calendar Year-To-Date		2613000,20	Disbursemen	l For: Pri	mary X General
Per Election for Office Sought	1	, 2613000.20		ther (specify) >	
(a) SUBTOTAL of Itemized Independent Expenditu	res		·· •	6	141123.50
(b) SUBTOTAL of Unitemized Independent Expend	litures	**************************************	" •	•.	
(c) TOTAL Independent Expenditures			" ▶	•	•
Under penalty of periury I certify that the Independ with, or at the request or suggestion of, any candid party committee) any political party committee or its	late or authoriz				
Kelly C, Ward		Date	ע ע 10 •	19	2016
Signature			•		-

24/48 HOUR REPORT OF INDEPENDENT EXPEN	DITURES	
(Schedule E)		PAGE 48 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)		
DCCC		FEC IDENTIFICATION NUMBER T
		C C00000935
		N U & P 1 T T Y
Check if 24-hour report 48-hour regort X. New r	eport , 📑 Amends repo	rt filed on
Full Name of Payee	•	Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 10/24/16		10 24 2016
Mailing Address 11150 Fairfax Blvd	•	
Suite 50,5		Amount
City State	Zip Code	45000,00
Fairfax VA	22030.	Transaction ID : SE-952072 Date of Disbursement or Obligation
Purpose of Expenditure	Category/	11 4 . 2 9
Media Buy	Type 004	10 17 2016
Name of Federal Candidate	Support	Office Sought: , House District: 00
Donald J. Trump	X Oppose	XI President Senate State:
Catendar Year-To-Date		Disbursement For: : Primary X General
Per Election for Office Sought	3653174,61	2016 Other (specify) >
Full Name of Payee		Date of Public Distribution/Dissemination
AL Media LLC		
Date of Dissemination: 10/24/16		10 24 2016
Mailing Address 222 W Ontario St		Amount
Suite 600		
City State	Zip Code	131250.00
Chicago II.	60654	Transaction ID : SE-953187 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy	Category/ 004	10 21 2018
·	Type	10 21 2010
Name of Federal Candidate	- Support	Office Sought: House District: 00
Oonald J. Trump	X: Oppose	X President Senate State:
Calendar Year-To-Date		Disbursement For: Primary K General
Per Election for Office Sought	3653174.61	2016 Other (specify) >
	·	
(a) SUBTOTAL of Itemized Independent Expenditures	*	176250,00
(,		, , , , , , , , , , , , , , , , , , , ,
(b) SUBTOTAL of Uniternized Indopendent Expenditures	4*************************************	
•		
(c) TOTAL Independent Expanditures		_
Under penalty of perjury I certify that the independent expenditure with, or at the request or suggestion of, any candidate or authorize	es reported herein were r ed committee or agent of	not made in cooperation, consultation, or concert either, or (if the reporting entity is not a political
party committee) any political party committee or its agent.		. , , , , , , , , , , , , , , , , , , ,
		, , , , , , , , , , , , , , , , , , ,
Kelle C. Word	Date	10 25 2016
Signature		

	1/48 HOUR REPORT OF INDEPEND	ENT EXPEN	IDITURES	PAGE 52 OF 60
(5	chedule E)			FOR SE OF FORM 24/48
	AME OF COMMITTEE (In Full)			FEC IDENTIFICATION NUMBER V
	DCCC			C c00000935
C	heck if 24-hour report 48-hour report	New	report Amends repo	ort filed on
	Full Name of Payer Screen Strategies Media, LLC Date of Disseminat	ion: 10/25/16		Date of Public Distribution/Dissemination
	Mailing Address 11150 Fairfax Blvd			Amount
	Suite 505			
	City Fairfax .	Slate VA	Zip Code 22030	54326.00 Transaction ID : SE-953184 Date of Disbursoment or Obligation
	Purpose of Expenditure Media Buy		Category/ Type 004	10 21 2016
	Name of Federal Candidate		Support	Office Sought: House District: 00
	Donald J. Trump		Oppose	President Senate State:
	Calendar Year-To-Date Per Election for Office Sought		4369947.93	Disbursement For: Primary General 2016 — Other (specify).
	Full Name of Payee		·	Date of Public Distribution/Dissemination
	Buying Time, LLC Date of Dissemination	ion: 10/25/16		10 25 2016
	Mailing Address 650 Massachusetts Avenue Suite 210	, NW		Amount
	City	State	Zip Code	62488.00
•	Washington	DC.	20001	Transaction ID : SE-953185 Date of Oisbursement or Obligation
	Purpose of Expenditure Media Buy	•	Category/ Type 004	10" 21" (2016"
	Name of Federal Candidate		Support	Office Sought: House District: 00
	Donald J. Trump		X Oppose	Président Senate State:
	Calendar Year-To-Date Per Election for Office Sought	3.	4369947.93	Disbursement For: Primary X General 2016 — Other (specify) ▶
	(a) SUBTOTAL of Itemized Independent Expendent (b) SUBTOTAL of Unitemized Independent Exp			
	(c) TOTAL Independent Expenditures			· •
		ndidate or authoriz		not made in cooperation, consultation, or concert if either, or (if the reporting entity is not a political
	Kelly C. Ward	•	Date	10 25 2016
	Signature		_	

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 8 OF 8
NAME OF COMMITTEE (In Full)	FOR SE OF FORM 24/48
DCCC	FEC IDENTIFICATION NUMBER Y
•	C C00000935
Check if 24-hour report 48-hour report New report Amends report filed	on . a b v · 1
Full Name of Payes Screen Strategies Media, LLC	Date of Public Distribution/Dissemination
Date of Dissemination: 10/31/16	10 31 2016
Mailing Address 11150 Fairfax Blvd	- Amount
Suite 505	
City State Zip Code	55000.00 Transaction ID : SE:953293
Fairfax · VA 22030	Oate of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type 004	10 25 2016
Name of Federal Candidate Support Office	Sought: I House District: 00
1	President Senate State:
October 14 - 15 Bala	reament For: Primary N General
Per Election for Office Sought 4979620.65 2016	Other (specify) >
Full Name of Payee	Date of Public Distribution/Dissemination
AL Media LLC	
Date of Dissemination: 10/31/16 Mailing Address 222 W Ontario St	"10" 31" 2016
222 17 011,070 01	Amount
Suite 600 City Slate Zip Code	145976 00
City State Zip Code Chicago IL 60654	115875.00 Transaction ID : SE-954178 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type OD4	10" 27" 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Donald J. Trump Coppose X	President Senate State:
Calendar Year To-Date Disbu	ursement For: Primary X General
Per Election for Office Sought 4979620.65 2016	Otner (specify)
(a) SUBTOTAL of Itemized Independent Expenditures	170875.00
(b) SUBTOTAL of Uniternized Independent Expenditures	. ,
(c) TOTAL Independent Expenditures	, 433711.75
Under penalty of perjury I certify that the independent expenditures reported herein were not ma with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	
Kelly G. Wurd	, , ,
Signature Date 10	

Image# 201611049037121060

	1/48 HOUR REPORT OF	INDEPENDENT	EXPEND	TURES				PAGE 10	0 OF 11	_
•	chedule E)								F FORM 24/48	_
	AME OF COMMITTEE (In Full)						FEC	IDENTIFICAT	ion number 🔻	
L				<u>. </u>			C	C00000935		
Ch	neck if 🗷 24-hour report 🗌	48-hour report	× New repo	ort Am	nends repor	rt filed o	n H	10101		-
	Full Name of Payee Screen Strategies Me Date	edia, LLC te of Dissemination: 11/	IDAI1R				TUTAT	المعقاء	VDissemination	7
	Mailing Address 11150 Fairfax		<u> </u>			\dashv	11	04	2016	į
	Suite 505					1,	Amount			
ļ	City		State	Zip Code		-11		A 451	40000.00	
	Fairfax	•	VA	22030				n ID : SE-9541 bursement or		۲
	Purpose of Expenditure Media Buy			Category/ Type]	10	27	2016	
	Name of Federal Candidate			:	Support	Office S	Sought:	House	District: 00	
	Trump, Donald, J., ,			X	Oppose	× P	President	Senate	State:	_
	Calendar Year-To-Date Per Election for Office Sou	ughttt	ر الله منظم الله الله الله الله الله الله الله الل	6419383.70		Disburs 2016	ement For:	Primar	y 🗶 General	
Ì	Full Name of Payce	•				1			n/Dissemination	Ī
	AL Media LLC	te of Dissemination: 11/	/04/16				11	04	2016	1
	Mailing Address 222 W Ontai		•			\neg	-	استسا	and the same	į
Ì	Suite 600						Amount			
ł	City		State	Zip Code	Man.				3750.00	
	Chicago		IL	60654			ransaction Date of Dis	ID: SE-95498 bursement or	i8 Obligation	*
	Purpose of Expenditure Media Buy	•		Category/ Type		J	11	04	2016	1
ı	Name of Federal Candidate			;	Support	Office S	Sought:	House	District: 00	-
	Trump, Donald, J., ,			K	Oppose	K P	President	Senato	State:	_]
	Calendar Year-To-Date Per Election for Office Sou	ught		6419383.70		Disburs 2016	sement For: Other (Primar	y 🗶 General	
	<u></u>								The state of the s	
	(a) SUBTOTAL of Itemized Inde	pendent Expenditures.	******************		***************	• L		Carte and State	43750.00	
ĺ	(b) SUBTOTAL of Uniternized In	idependent Expenditur	'es	/4 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		· • [المستحد	, magazerganega. I mademakanii in		
((c) TOTAL independent Expendi	itures	100000000000000000000000000000000000000	••••••••	***************************************	·		,		J
•	Under penalty of perjury I certify with, or at the request or sugges party committee) any political par	stion of, any candidate	or authorized	reported her committee (rein were r or agont of	not made f oithor, (e in cooper or (if the re	ation, consulte porting antity	ation, or concert is not a political	
	Ward, Kelly, C., ,		<i>l'Electroni</i>	ically Filed]	Date	1 11	04	7 Y Y Y Y 20'	********** 16 1	
	Signature			, , , , , , , , , , , , , , , , , , , ,	Daic		نتسا ا	تتسا ل	نسسا	1

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Signature

Image# 201611049037121059 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES PAGE 9 OF 11 (Schedule E) FOR SE OF FORM 24/48 NAME OF COMMITTEE (In Full) FEC IDENTIFICATION NUMBER V DCCC C00000935 Check if | 24-hour report | 48-hour report x New report Amends report filed on Full Name of Payee Date of Public Distribution/Dissemination Screen Strategies Media, LLC Date of Dissemination: 11/04/16 2016 Mailing Address 11150 Fairfax Blvd Amount Suite 505 City Stato Zip Code 13000.00 Transaction ID: SE-954882 VA Fairfax 22030 Date of Disbursement or Obligation Purpose of Expenditure Category/ Media Buy 004 03 2016 Type Name of Federal Candidate Support Office Sought: House District: Trump, Donald, J.,, l x l Oppose × President Sonate State: Disbursement For: Primary × General Calendar Year-To-Date 2016 Per Election for Office Sought 6419383.70 Other (specify) ▶ Full Name of Payee Date of Public Distribution/Dissemination The New Media Firm, Inc. Date of Dissemination: 11/04/16 04 2016 Mailing Address 1730 Rhode Island Ave., NW Amount Suite 213 State Zip Code City 46000.00 Transaction ID : SE-954883 DC 20036 Washington Date of Disbursement or Obligation Purpose of Expenditure Category/ 004 Media Buy 03 2016 Type Name of Federal Candidate Support Office Sought: House District: 00 Trump, Donald, J.,, Oppose × President Senate State: Disbursement For: **Primary** ⋉ Goneral Calendar Year-To-Date 2016 6419383.70 Per Election for Office Sought

L			Content (appenis)
(a)	SUBTOTAL of Itemized Independent Expenditures	>	59000.00
(b)	SUBTOTAL of Unitemized Independent Expenditures	•	
(c)	TOTAL Independent Expenditures	•	
-			

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Ward, Kelly, C., ,	[Electronically Filed]	Date	11	04	2016

Image# 201612089039916524

SCHEDULE E (FEC Form 3X) ITEMIZED INDEPENDENT EXPENDITURES

<u>.: </u>					TOK LINE	24 OF FORM 3
ME OF COMMITTEE (In Full) CCC			·	ł	DENTIFICA	ION NUMBER
				C	.C0000093	5
ick II 24-hour report 48-hour report	New re	port Amends repo	on liled	on		
Full Name of Payee Screen Strategies Media, LLC		, Memo	kem	Date of Publ		n/Dissemination
Date of Dissemination: 11/07/16 - 24 hours prior Mailing Address 11150 Fairfax Slvd	to election day		-	11	07.	2016
Suité 505				Amount		
City	State	Zip Code				38173.50
Fairfex	VA	22030		Transaction Date of Disb		
Purpose of Expenditure Media Buy		Category/ Type (10		11	Ó1	2018
Name of Federal Candidate:		Support	Office	Sought:	House	District:
Trump, Donald, J., ,		× Oppose	×	President	Senate	State:
Calendar Year-To-Date Per Election for Office Sought		6693372.69	Disbu 201ō	rsement For: Other (s	: : Prma pecily) ►	ry '× Genera
Full Name of Payee The New Media Firm, Inc. Date of Dissemination: 11/01/16		Memo	Itern	Date of Publ	ic Distributio	n/Dissemination
Mailing Address: 1730 Rhode Island Ave., NW Suite 213				Amount		·
City	State	Zip Code				3566.00
Washington	DC	20036		Transaction Date of Disb		
Purpose of Expenditure Media Production		Category/ Type 004		113	01	2016
Name of Federal Candidate:		Support	Office	Sought:	House	District:
Trump, Donald, J., ,		ير Oppose	×	President	Sonate	State;
Calendar Year-To-Date Per Election for Office Sought		6693372,69	Disbu 2016	rsement For:	•	ry 🔀 Genera
			j	f Other (a	Decity)	
) SUBTOTAL of Uniternized Independent Expend	lilu:es •••	*'	>	. Oner (s	econy) P	41739.50
s) SUBTOTAL of Uniternized Independent Expends s) TOTAL Independent Expenditures	ndent expenditure	s reported herein were		ide in coopera	tion; consult	ation, or concert
a) SUBTOTAL of Itemized Independent Expenditures a) SUBTOTAL of Unitemized Independent Expenditures b) TOTAL Independent Expenditures	ndent expenditure	s reported herein were	ol elihe	ide in coopera	ation; consult porting entity	ation, or concert

24/48 HOUR REPORT OF INDEPENDEN	IT EXPEN	DITURES		
(Schedule E)				PAGE 51 OF 52 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)				
DCCC				FEC IDENTIFICATION NUMBER
				. С соооооэз
Check if 24-hour report 48-hour report	X: New n	eport Amends repo	ort filed	on the state of th
Full Name of Payee			1	Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination:	10/18/16			10 18 2016
Mailing Address 11150 Fairfax Blvd				10 10 2010
Suite 505			ļ	Amount
City	State	Zip Code		124909 50
	VA	*	ŀ	134898.50 Transaction ID.: SE-952377
Fairfax	VA	22030		Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004		10 11 2016
Name of Federal Candidate	· · · · · · · · · · · · · · · · · · ·	Support	Office	Sought: House District: 00
Donald J. Trump				
	·	X: Oppose	<u> X</u>	President Senate State:
Calendar Year-To-Date		20,12000 00	Disbu	rsement For: Primary X General
Per Election for Office Sought	1)	2613000.20	2010	Other (specify) >
Full Name of Payee		····	i	Date of Public Distribution/Dissemination
Kully Hall, LLC				
Date of Dissemination:	10/18/16	70 Common A Com Common (1997)		10 18 2016
Mailing Address 1932 1st Ave, Suite 203				Amount
City	State	Zip Code		6225.00
Seattle	WA	98101	ļ	Transaction ID : SE-952379
Purpose of Expenditure		T _ :		Date of Disbursement or Obligation
Media Buy Media Production		Category/ Type	1	`10 ^{'''}
Name of Federal Candidate		Support	Office	Sought: ' House District: 00
Donald J. Trump		X. Oppose	ì	President Sonate State:
		, y - , , , - , - , - , - , - , - , - ,		
Calendar Year-To-Date Per Election for Office Sought		2613000.20	2016	resement For: Primary X General
Fer Election for Onice Soughi	, ,	•	<u> </u>	Other (specify) >
(a) SUBTOTAL of Itemized Independent Expenditure	es	······································		141123.50
			•	•
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(b) Collective of Cimorinated Mediperioris Experiori			. •	•
(a) TOTAL Independent Eveneditures				
(c) TOTAL Independent Expenditures	····	***************************************	, ▶	, .
		 		
Under penalty of perjury I certify that the independe with, or at the request or suggestion of, any candida parry committee) any political party committee or its	ite or authorize			
				1
Kelly C. Ward		Data	٠.,	,, D 19 2016
Signature	· · · · · · ·	Date		, 19 (010

Signature

Image# 201610139032426300 24/48 HOUR REPORT OF INDEF	ENDENT EXPEND	ITURES	
(Schedule E)			PAGE 3 OF 3 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)			
DCCC			FEC IDENTIFICATION NUMBER ▼
			Ci c00000935
Check If 24-hour raport 48-hour	report X New rep	ort Amends repo	ort filed on
Full Name of Payor Buying Time, LLC		•	Oato of Public Distribution/Dissemination
Mailing Address 650 Massachusetts Ave			10 (11) 2016
Suite 210	1100, 1777		Amount
City	Slate	Zip Code	57500.00
Washington	DC	20001	Transaction ID : SE-951439 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy	•	Category/ Type 004	10 11 2018
Name of Federal Candidate		Support	Office Sought: House District: 00
Trump, Donald, J., ,		(X) Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought		1459931.62	Disbursoment For: Primary Seneral 2016 Other (specify) ▶
	# 13.1 2.1.1		
Full Name of Payee Screen Strategies Media, LLC) mination: 10/12/16		Daie of Public Distribution/Dissemination
Molling Address 11150 Fairfax Blvd	11012001. 1011270		10 12 2016
11100124124	•	•	Amount
Sulte 505	Siato	Zip Code	74632.00
Fairtax	VA	22030	Transaction ID : 9E-951438 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ 004	10 1 2016
Name of Fodoral Candidate		Support	Office Sought: House District: 00
Trump, Donald, J., ,		Oppose	President Senate State:
Calendar Year-To-Date	h-i sembe-brimb.	Ambarda dest	Dishursement For Primary X General
Per Election for Office Sought		1534563.62	2016 Other (specify) >
(a) SUBTOTAL of Itemized Independent in	Expenditures		grand and the second of the se
(b) SUBTOTAL of Unitemized Independent	nt Expenditures	[}]	Party destination of the same
(c) TOTAL Independent Expenditures	•	***************************************	170032.00
	ny candidate or authorized		not made in cooperation, consultation, or concert of either, or (if the reporting entity is not a political
Ward, Kelly, G.,	l Electroni	cally Filed Date	10 13 1 2016
Signature	,	Date	

	N48 HOUR REPORT OF INDEPENDE chedule E)	NT EXPEND	TURES		PAGE 17 OF 17
_	•		· · · · · · · · · · · · · · · · · · ·		FOR SE OF FORM 24/48
	AME OF COMMITTEE (In Full)				FEC IDENTIFICATION NUMBER V
					C. c00000935
Ci	heck if 24-hour report 48-hour report	New repo	ort Amends repo	ort filed	on 1 4 1 1 1 5 7 8 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7
	Full Name of Payee Screen Strategies Media, LLC Date of Dissemination:	10/20/16			Date of Public Distribution/Dissemination 10 20 2016
	Mailing Address 11150 Fairfax Blvd - Suite 505				10 20 2016 ·
	City	State	Zip Code		107040.00
	Fairfax	VA	22030		Transaction ID: SE-952389 Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy		Category/ 004	i	10 18 2016
•	Name of Federal Candidate		Support	Office	Sought: House District: 00
	Donald J. Trump		Oppose	X	President Senate State:
	Calendar Year-To-Date Per Election for Office Sought	., 29	89611.20 l	Disbu 2016	recment For: Primary ⊠ General Other (specify) ▶
	Futi Name of Payed AL Media LLC				Date of Public Distribution/Dissemination
	Date of Dissemination:	10/20/16			10 20 2016
	Mailing Address 222 W Ontario St Suite 600				Amount
	City	State	Zip Code		140250.00
	Chicago	il.	60654		Transaction ID : SE-952071 Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy		Calegory/ 004		10 17 2016
	Name of Federal Candidate		Support	Office	Sought: House District: 00
	Donald J. Trump		∑ Oppose	X	President Senate State:
	Calendar Year-To-Date Per Election for Office Sought	ء م المقات عدا -	2989611.20	Disb. 2016	rsement For: Primary X General Other (specify) ▶
	. (a) SUBTOTAL of Itemized Independent Expenditu	res] [[[]] [] [] [] [] [] [] []	. •	247290.00
	(b) SUBTOTAL of Unitemized Independent Expend	itures	······································	•	
	(c) TOTAL Independent Expenditures		44	•	652070.38
	Under penalty of perjury I certify that the independ with, or at the request or suggestion of, any candid party committee) any political party committee or its	ate or authorized			
	Kelly C. Ward		Date	. 10	21 2016
	Signature				F

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	73.05 15 05 16
(Schedule E)	PAGE 15 OF 15 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	
DCCC	FEC IDENTIFICATION NUMBER V
	C C00000935
	4 9" 1 6" 10" 1 "4" "7" 4" 4"
Check if 24-hour report 48-hour report New report Amends report filed	on -
Full Namo of Payoe	Date of Public Distribution/Dissemination
Prism Communications, Inc. Date of Dissemination: 10/27/16	10 27 2016
Mailing Address 1000 Potomac Street, NW	
Suite 420	Amount
City State Zip Code	3291.58
Washington DC 20007	Transaction ID : SE 953927 Date of Disbursement or Obligation
Purpose of Expenditure Category/ Category/	Date of Dischisament of Congadon
Media Production Category 004	10 26 1 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Doneld J. Trump	President Senate State:
Calendar Year-To-Date Disbur	rsement For: Primary Xi General
Per Election for Office Sought 4550355.45 2016	Other (spacity) >
Full Name of Payee	Date of Public Distribution/Dissemination
76 Words Corp.	U u t 5 6 t 7 T V 7
Date of Dissemination: 10/26/16	10 26 2016
Mailing Address 1121 5th St. NW	Amount
Floor#1	an whose
City State Zip Code	5500.00
7100 mg/s/	Transaction ID : SE-954171 Date of Disbursement or Obligation
Purpose of Expenditure Media Production Category/ 004	10 27 2018
Type Type	10 21 2010
Name of Federal Candidate Support Office	Sought: House District: 00
Oppose Donald J. Trump	President Senate State:
Calendar Year To-Date	rsement For: Primary X General
Per Election for Office Sought 4436718.92 2016	Other (specify)
	Cilia (opació)
(a) SUBTOTAL of Itemized Independent Expenditures	8791 58
(a) SOBIOINE OF REFIRED INSOPERIOR EXPENDITIONS	ا المادين
(b) SUBTOTAL of Uniternized Independent Expenditures	ter on the same and the same
(b) 30010174 of orderinger independent experiences information independent experiences	
(e) TOTAL Indopendent Expenditures	
(4) 1018 11-04-04-04-04-04-04-04-04-04-04-04-04-04-	۱/71/6/// ۲ مسمد الاستان الاستان
Under penalty of perjury I certify that the independent expenditures reported herein were not max with, or at the request or suggestion of, any candidate or authorized committee or agent of either, party committee) any political party committee or its agent.	
Kelly C. Ward	'11
Signature Date 10	27 2016

	/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	SACE 20 OF 25
(S (chedule E) .	PAGE 22 OF 25 FOR SE OF FORM 24/48
N/	AME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER V
[OCCC	The second secon
ŀ		*C' c00000935
-		* 11 - 31 - 4 - 4 - 4 - 4 - 4 - 4 - 4 - 4 - 4 -
Cř	nack if 24-hour report 💢 48-hour report 💢 New report 🗍 Amends report file	d on '
	Full Name of Payee	Date of Public Distribution/Dissemination
	Kully Hall, LLC Date of Dissemination: 10/12/16	10 1 12 2016
	Mailing Address 1932 1st Ave, Suite 203	-
		Amount
	City State Zip Code	4297.00
	Seattle WA 98101	Transaction ID : SE-951665
	Purpose of Expenditure Cotegory/	Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy Media Production Typo	10 14 2016
	Name of Federal Candidate Support Office	e Sought: House District: 00
	Donald J. Trump Oppose	President Senate State:
		ursement For: Primary General
	Calendar Year-To-Date 1721688.30 Dist Por Election for Office Sought 1721688.30	
	Toporrelate all the company of the c	Other (specify) >
	Full Name of Payee The New Media Firm, Inc.	Date of Public Distribution/Dissemination
	Date of Dissemination: 10/12/16	10 12 2016
	Mailing Address 1730 Rhode Island Ave., NW	Amount
	Suite 213	- 4 1
•	City State Zip Code	56930.43
	Washington DC 20036	Transaction ID : SE-951666 Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy Category/ 1 Tugo 004	10 12 2016
	Type Type	- 1
	Name of Federal Candidate Support Office	ce Sought: House District: 00
	Donald J. Trump Oppose	President Senato State:
	Calendar Year-To-Date Dist	pursoment For: Primary X General
	Per Election for Office Soughl 1721688.30 201	
۳		
	(a) CHREATAL of harriand today and at Europelituse	
	(a) SUBTOTAL of Itemized Independent Expenditures	61227.43
	the Company of the constant to december 19 to a self-town	e e e
İ	(b) SUBTOTAL of Unitemized Independent Expenditures	
	to Marie Internation Committee	پ⊸وری سان سان سان
	(c) TOTAL Independent Expanditures	ا أيراف المنسالة عداد الارتساسة.
<u> </u>		
	Under penalty of perjury I certify that the independent expenditures reported herein were not re	ade in cooperation, consultation, or concert
	with, or at the request or suggestion of, any candidate or authorized committee or agent of eith	er, or (if the reporting entity is not a political
	party committee) any political party committee or its agent.	
	Kelly C. Ward	g i was y stavi
	Oate	10 14 2016
١	Signature	

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24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES
(Schedule E)

Schedule E)	FOR SE OF FORM 24/48		
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER ▼		
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Full Name of Payee The New Media Firm, Inc. Date of Dissemination: 10/12/16	Date of Public Distribution/Dissemination		
Mailing Address 1730 Rhode Island Ave., NW	10 12 2016 Amount		
Suite 213	The transfer of the sale of the transfer of		
City State Zip Code Washington DC 20036	4047.25 Transaction ID: SE-951654 Date of Disbursement or Obligation		
Purpose of Expenditure Media Buy Media Production Category/ Type	10 12 2016		
.	Sought: House District: 00		
Trump, Donald, J., .	President Senate State:		
Calendar Year-To-Date Per Election for Office Sought Disbt 2016	ursement For: Primary		
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/12/16	Date of Public Distribution/Dissemination		
Mailing Address 11150 Fairfax Blvd	Amount		
Suite 505	-		
City State Zip Code Fairfax VA 22030	121850.00 Transaction ID : SE-951660 Date of Disbursement or Obligation		
Purpose of Expenditure Media Buy Category/ Type Out Type	10 12 2016		
	e Sought: House District: 00		
Trump, Donald, J., .	President Senate State:		
Calendar Year-To-Date Per Election for Office Sought Disburger 1721688.30 2016	ursement For:		
(a) SUBTOTAL of Itemized Independent Expenditures	125897.25		
(b) SUBTOTAL of Unitemized Independent Expenditures			
(c) TOTAL Independent Expenditures			
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.			
Ward, Kelly, C., . [Electronically Filed] Date 1	ייי איי איי איי איי מיי איי איי מיי איי א		
Signature	- 17 L 2010		

Image# 201610189033039655 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

Schedule E)	PAGE 21 OF 25 FOR SE OF FORM 24/48	
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER V	
DCCC	C c00000935	
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Full Name of Payee	ate of Public Distribution/Dissemination	
The New Media Firm, Inc. Date of Dissemination: 10/12/16	المصفر همما العقار المحمار	
Mailing Address 1730 Rhode Island Ave., NW	bushed become and	
Suite 213	nount	
*City State Zip Code	4047.25	
	ansaction ID : SE-952372 Ite of Disbursement or Obligation	
Purpose of Expenditure Media Buy Media Production Category/ Type	10 14 2016	
Name of Federal Candidate Support Office So	ught: House District: 00	
Trump, Donald, J., .		
Calendar Year-To-Date Per Election for Office Sought 1856586.80 Disburser 2016	nent For: Primary Seneral	
Full Name of Power	Other (specify)	
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/12/16	ate of Public Distribution/Dissemination	
Mailing Address 11150 Fairfax Blvd	المحسما لسما اسمسا	
Suite 505	uchantanta afranta famburturford uonut	
City State Zip Code Fairfax VA 22030 Tra	121850.00 nsaction ID : SE-952373 ate of Disbursement or Obligation	
Purpose of Expenditure Media Buy Category/ Type 004	10 14 2016	
Name of Federal Candidate Support Office So	ught: House District: 00	
Trump, Donald, J., ,	sident Senate State:	
Calendar Year-To-Date Per Election for Office Sought Disburser 2016	nent For: Primary	
z ~	de la company de	
(a) SUBTOTAL of Itemized Independent Expenditures	125897.25	
(b) SUBTOTAL of Unitermized Independent Expenditures		
(c) TOTAL Independent Expenditures	and an experience of	
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.		
Ward, Kelly, C., ,	18 2016	
Signature		

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES			
(Schedule E)	PAGE 3 OF 3 FOR SE OF FORM 24/48		
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼		
DCCC	C c00000935		
	have made and the design		
Check if 24-hour report 48-hour report New report Armends report filed on			
I Dinama Tima 110	of Public Distribution/Dissemination		
Date of Dissemination: 10/11/16	10 11 2016		
Mailing Address 650 Massachusetts Avenue, NW			
Sulto 210	MINE Partin, no may anagen as autala najudo i as au		
City State Zip Code	57500.00		
	saction ID: SE-951439 of Disbursement or Obligation		
Purpose of Evenediture	10 11 2016		
Name of Federal Candidate Support Office Soug	ht: House District: 00		
Conaid J. Trump Oppose President	dent Senato State:		
Calendar Year-To-Oato Disburserne	(+)		
Per Flection for Office Sought 1459931.62 2016 cmg	Other (specify)		
Full Name of Payee Date	of Public Distribution/Dissemination		
I Screen Strategies Media II C	المستنشدها المتنوا المتنوي		
Mailing Address 11150 Feirfox Blvd	10 12 2016		
Suite 505	unt		
City State Zip Code }	74632.00		
Date	action ID : SE-951438 of Disbursoment or Obligation		
Purpose of Expenditure Media Buy Category/ Type Category/	10 11 2016		
Name of Federal Candidate Support Office Soug	ht: House District: 00		
Donald J. Trump Oppose President	dent Senste State:		
San Slanton for Office Squark	nt For: Primary ⊠ General Other (specily) ▶		
(a) SUBTOTAL of Itemized Independent Expenditures	, 132132.00 .		
(b) SUBTOTAL of Unitemized Independent Expenditures			
	entered in authoritant subsention ()		
(c) TOTAL Independent Expenditures	170032,00		
Under ponalty of perjury I cortify that the Independent exponditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.			
Kelly C. Ward			
Signature Date , 10	13 2016		

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (School of E) (PAGE 50 OF 60		
(Schedule E)	FOR SE OF FORM 24/48	
NAME OF COMMITTEE (In Ful)	FEC IDENTIFICATION NUMBER V	
DCCC	C c00000935	
Check if 24-hour report 48-hour report New report Amends report lile	d on Three days	
Full Name of Payee Screen Strategies Media, LLC	Date of Public Distribution/Dissemination	
Date of Dissemination: 10/25/16	10 25 2018	
Mailing Address 11150 Fairfax BMd	Amount	
Suite 505	101050.00	
City State Zip Code Fairfex VA 22030	Transaction ID: SE-952388 Date of Disbursement or Obligation	
Purpose of Expenditure Media Buy Category/ Type 004	10 18 2016	
Name of Federal Candidate Support Office	e Sought: House District: 00	
Donald J. Trump Oppose	President Schate State:	
Calendar Year-To-Date Per Election for Office Sought Disb 2016	ursement For: Primary General	
Full Name of Payee	Date of Public Distribution/Dissemination	
Buying Time, LLC		
Date of Dissemination: 10/25/16 Mailing Address 650 Massachusetts Avenue NW	10 25 2016	
Maining Address 650 Massachusetts Avenue, NW Suite 210	Amount	
City State Zip Code	19691.00	
Washington DC 20001	Transaction ID : SE-953229 Date of Disbursement or Obligation	
Purpose of Expenditure Media Buy Catagory/ Type Catagory/ Type	10 24 2016	
Name of Federal Candidate Support Office	e Sought: House District: 00	
Donald J. Trump	President Senate State:	
Calender Year-To-Dato Per Election for Office Sought Disb 2010	oursement For: Primary General General Other (specify)	
7, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1,	L. J. Other (specify)	
(a) SUBTOTAL of Itemized Independent Exponditures	141541.00	
(b) SUBTOTAL of Uniternized Independent Expenditures		
(c) TOTAL independent Expanditures		
	had and a carbanders to a di	
Under penalty of perjury I certify that the independent expenditures reported heroin were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.		
	10 25 2016	
Signature	The state of the s	

	24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Separation 5) PAGE 57 OF 57		
(Sc	:hedule E)	FOR SE OF FORM 24/48	
	ME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER Y	
١	OCCC	C C00000935	
Ch	eck If 🔀 24-hour report 🔲 48-hour report 💢 New report 🦳 Amenda report file	ad on Land, Land, Land	
	Full Name of Payer Buying Time, LLC Date of Dissemination: 11/01/16	Date of Public Distribution/Dissemination	
	Mailing Address 650 Massachusetts Avenue, NW	11 01 2016	
	Sulte 210	Amount	
	City State Zip Code	17175.00	
	Washington . DC 20001	Transaction ID : SE-954373 Date of Disbursement or Obligation	
	Purpose of Expenditure Media Buy Cotegory/ Type Out Type	10 28 2016	
		ce Sought: House District: 00	
	Donald J. Trump Oppose	President Senate State:	
	Calendar Year-To-Date Per Election for Office Sought 5894458.07 Dis		
	Full Name of Payee	Other (specify)	
	Screen Strategies Media, LLC Date of Dissemination: 11/01/16	Date of Public Distribution/Dissemination	
	Mailing Address 11150 Fairfax Blvd	المستقبط المتطا	
	Suite 505	Amount	
	City State Zip Code	74850.00	
	Fainfax VA 22030	Tronsaction ID : SE-954175 Date of Disbursement or Obligation	
	Purpose of Expenditure Media Buy Category/ Type O04	10 27 2016	
	Name of Federal Candidate Support Offi	ce Sought: House District: 00	
	Donald J. Trump Coppose D	(President Senate State:	
	Calendar Year-To-Date Per Election for Office Sought Display 17	bursement For: Primary ☐ General	
Г			
	(a) SUBTOTAL of Itemized Independent Expenditures		
	(b) SUBTOTAL of Uniternized Independent Expenditures		
	(c) TOTAL Independent Expenditures	14333615.05	
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.			
	Kelly C. Ward Signature	11 02 2016	
Ц.			

Image# 201611069037127397 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES		
(Schedule E)	PAGE 11 OF 12	
NAME OF COMMITTEE (In Full)	FOR SE OF FORM 24/48	
DCCC	FEC IDENTIFICATION NUMBER V	
	C c00000935	
Check if X 24-hour report 48-hour report A	mends report filed on	
Full Name of Payee	Date of Public Distribution/Dissemination	
Screen Strategies Media, LLC Date of Dissemination: 11/05/16	11 05 2016	
Mailing Address 11150 Fairfax Blvd	المنفضا لنبا لنبا	
Suite 505	Amount	
City State Zip Code	58700.00	
Fairfax VA 22030	Transaction ID: SE-954453	
Purpose of Expenditure Modio But	Date of Disbursement or Obligation	
Media Buy . Type		
Name of Federal Candidate	Support Office Sought: House District: 00	
Trump, Donald, J., ,	Oppose President Senate State:	
Colendar Year-To-Date	Disbursement For: Primary X General	
Per Election for Office Sought 6526208.1	9 2016 Other (specify) ▶	
Full Name of Payee	Date of Public Distribution/Dissemination	
Canal Partners Media, LLC Date of Dissemination: 11/06/16	[HEH] , [GEG] , [VEVEVEV]	
Mailing Address 25 Whitlock Place	11 06 2016	
Suite 200	Amount	
City State Zip Code	7910.00	
Marletta GA 30064	Transaction ID: SE-954884 Date of Disbursement or Obligation	
Purpose of Expenditure Category	PARCE CONTRACTOR	
Media Buy Type		
Name of Federal Candidate	Support Office Sought: House District: 00	
Trump, Donald, J., ,	Oppose President Senate State:	
Calendar Year-To-Date	Disbursement For: Primary X General	
Per Election for Office Sought 6648199.1		
(a) SUBTOTAL of Itemized Independent Expenditures	66610.00	
(b) SUBTOTAL of Unitemized Independent Expenditures		
	in the second	
(c) TOTAL Independent Expenditures		
Under penalty of parjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.		
Ward, Kelly, C., . [Electronically Filed]	Date 11 06 2016	
Signature	Date 11 06 2016	

Image# 201610189033039653 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

Schedule E)	PAGE 19 OF 25 FOR SE OF FORM 24/48	
VAME OF COMMITTEE (In Full) DCCC	C00000935	
Check if 24-hour report 🕱 48-hour report 🔊 🗌 New report 🗷 Amends report filed on	14. 2016	
Full Name of Payee Ralston Lapp Media, LLC Date of Dissemination: 10/14/16 Date of Payee	blic Distribution/Dissemination	
Mailing Address 1054 31st Street, NW Suite 430 Amount	14 2016	
City State Zip Code Washington DC 20007 Transaction	12260.71 on ID : SE-951877	
Purpose of Expenditure Media Production Category/ Type Out 10	sbursement or Obligation	
Name of Federal Candidate Support Office Sought: Hurd, William, , ,	K House District: 23	
Calendar Year-To-Date Calendar Year-To-Date Disbursement Fo	C C C	
	ublic Distribution/Dissemination	
Mailing Address 650 Massachusetts Avenue, NW Amount Suite 210	المنتما لمناك	
	53000.00 n ID : SE-952374 isbursement or Obligation	
Purpose of Expenditure Media Buy Category/ Type Out 10	/ 0 13 / 2016	
Name of Federal Candidate Trump, Donald, J., Support Office Sought: K Oppose K President	House District:	
Calendar Year-To-Date Per Election for Office Sought 1919459.68 Disbursement For 2016 Other	r: Primary 🗷 General (specify) ▶	
(a) SUBTOTAL of Itemized Independent Expenditures	65260.71	
(b) SUBTOTAL of Unitermized Independent Expenditures		
(c) TOTAL independent Expenditures		
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.		
Ward, Kelly, C [Electronically Filed] Date 10	8 2016	

I

Ward, Kelly, C., ,

Signature

	PENDENT EXPEN	DITURES	PAGE 52 OF 52
hedule E)	-		- PAGE 52 OF 52 FOR SE OF FORM 24/48
ME OF COMMITTEE (In Full)		·	FEC IDENTIFICATION NUMBER
CCC			C c00000935
ck if 24-hour report 3 48-hour	report New re	aport Amends repo	ort filed on
Full Name of Payee The New Media Firm, Inc. Date of Disse	emination: 10/18/16		Date of Public Distribution/Dissemination
Mailing Address 1730 Rhode Island Ave			
Suite 213	•••••		Amount
City	State	Zip Code	3407,87
Washington	DC	20036	Transaction ID : SE-952382 Date of Disbursement or Obligation
Purpose of Expanditure Media Buy Media Production	•	Category/ Type	10 18 2016
Name of Federal Candidate	·····	Support	Office Sought: House District: 00
Trump, Donald, J., ,		X Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought		2613000.20	Disbursement For: Primary General Other (specify) Other (specify) ✓
Full Name of Payee			Date of Public Distribution/Dissemination
A 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	emination: 10/18/16		10 18 2016
Mailing Address 650 Massachusetts A Suite 210	lvenue, NW		Amount
City	State	Zip Code	83829.00
Washington	DC	20001	Transaction ID : SE-952073 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004	10 ' 17 ' 2016
Name of Federal Candidate		Support	Office Sought: House District: 00
Trump, Donald, J., ,		Y Oppose	President Scnate State:
Calendar Year-To-Date Per Election for Office Sought		2613000.20	Disbursement For: Primary ☐ General General
	Expenditures	-	87236.8 7
a) SUBTOTAL of Itemized Independent		· · · · · · · · · · · · · · · · · · ·	
(a) SUBTOTAL of Itemized Independent	•		
(a) SUBTOTAL of Itemized Independent (b) SUBTOTAL of Unitemized Independe	•	•	

[Electronically Filed]

Date 10 19 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E) PAGE 52 OF 60			
(Schedule E)	FOR SE OF FORM 24/48		
NAME OF COMMITTEE (in Full) DCCC	FEC IDENTIFICATION NUMBER Y		
	C c00000935		
Check if 24-hour report 48-hour report New report Amends report file	d on Mary 1		
Full Name of Payes Screen Strategies Media, LLC Date of Discomination; 10/25/16	Date of Public Distribution/Dissemination		
Mailing Address 11150 Feirlex Blvd	Amount		
Suite 505	· · · · · · · · · · · · · · · · · · ·		
City State Zip Code Fairfex VA 22030	64326.00 Transaction ID : SE-953184		
Purpose of Expenditure Media Buy Category/ Type 1	Date of Disbursement or Obligation		
Books 1 Warms	e Sought: House District: 00		
M obbose 1	President Senate State:		
Calendar Year-To-Date Por Election for Office Sought 1 4369947.93 2016	urscment For: Primary General Other (specify)		
Full Name of Payee Buying Time, LLC Date of Dissemination: 10/25/16	Date of Public Distribution/Dissemination		
Mailing Address 650 Massachusetts Avenue, NW	In-the formation and		
Sulte 210	Amount		
City State Zip Code	62488.00		
Washington DC 20001	Transaction ID : SE-953185 Date of Disbursement or Obligation		
Purpose of Expenditure Media Buy Category/ Type Out	10 21 2016		
Name of Federal Candidate Support Office	e Sought: House District: 00		
Donald J. Trump Oppose	President Senate State:		
Calendar Year-To-Date Por Election for Office Sought A369947.93 Disb 2016	ursement For: The Primary General Other (specify)		
(a) SUBTOTAL of Itemized Independent Expenditures	126814.00		
(b) SUBTOTAL of Uniternized Independent Expenditures			
(c) TOTAL Independent Expenditures			
Under penalty of perjury I certify that the Independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.			
Kelly C. Ward Date	10 25 2016		
Signature	d Sant I d		